

**EPA Registration Number 91234-19**

Decision Seq: 518428 Action Code: R301,NEW PRODUCT;IDENTICAL OR SUBSTANTIALLY SIMILA

FFS Start Date: 07-Jul-2016 Tentative Ind: No Start/Stop Clock FQPA Clock:

Due Date: 07-Nov-2016 75-Day Due Date: Days Elapsed:

OPP Target Due Date: 21-Day Due Date: 07-Jul-2016 FFS Original Decision:

Negotiated Due Date: 45-Day Due Date: 22-Aug-2016

Registrant: Predecisional Due Date: 24-Oct-2016 Add to Bundle?

Response Due Date:

Current Status: CLOSED (07-Nov-2016)

Bundle ID:

Decision Status  
Tracking  
Create Resubmission  
FFS Letters  
Waiver Documentation  
Action Code History  
Secondary Decision  
Decision Bundle

75 Day Letters 45/90 Day Screen Primary Decisions Decision Milestone  
FFS Negotiated Due Dates OPP Target Due Date Decision Comments Payment Unmatched Payments  
Decision Ownership Receipts Data Package Reduced Risk Meetings & Milestones FFS Information

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
S:994579	Rodia, Carmen	91234-19	07-Nov-2016	OBJECTION - LABEL DEFICIENCY Resubmitted for updated label.
S:994581	Rodia, Carmen	91234-19	07-Nov-2016	3(c)(7)(A) Conditional Registration Submission of final updated master label.
S:987841	Rodia, Carmen	91234-19	07-Nov-2016	OBJECTION - LABEL DEFICIENCY Initial application for registration of new chlorfenapyr product.

Viewing Record 1 of 1

# PROCESSING REQUEST

Reg # 91234-19

Decision # 518428

Description:

Electronic Label & Letter  
(see PPLS)

OR

Non Electronic  
Label & Letter  
(Scanning required)

☒ Dated: 11-7-16

☐ Dated:

\*\*\*Only one label type should be selected\*\*\*

Other Materials Sent (see jacket):

☒ New CSF(s) Dated: 5-26-16

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Carmen Rodia

Division: RD/Invertebrate & Vertebrate Branch #2

Phone: (703) 306-0327

Date: 11-7-16



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs  
Registration Division (7505P)  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

EPA Reg. Number:

91234-19

Date of Issuance:

11/07/2016

NOTICE OF PESTICIDE:

☒ Registration  
☐ Reregistration  
(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

A103.02

Name and Address of Registrant (include ZIP Code):

Ms. Nicole O'Loughlin  
Agent for Atticus, LLC  
c/o Pyxis Regulatory Consulting, Inc.  
4110 136<sup>th</sup> St. Ct. NW  
Gig Harbor, WA 98332

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Richard Gebken, Product Manager 10  
Invertebrate & Vertebrate Branch 2  
Office of Pesticide Programs

Date:

11/07/2016

2. You are required to comply with the data requirements described in the Generic DCI identified below:

- a. Chlorfenapyr GDCI-129093-1034

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division:

<http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1>

3. The data requirements for storage stability and corrosion characteristics (Guidelines 830.6317 and 830.6320) are not satisfied. A one year study is required to satisfy these data requirements. You have 18 months from the date of registration to provide these data.
  4. Make the following label changes before you release the product for shipment:
    - Revise the EPA Registration Number to read, "EPA Reg. No. 91234-19."
  5. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSF:

- Basic CSF dated 05/26/2016

Page 3 of 3  
EPA Reg. No. 91234-19  
Decision No. 518428

If you have any questions, please contact Mr. Carmen J. Rodia, Jr. by phone at (703) 306-0327, or via email at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).

Sincerely,



Richard Gebken  
Product Manager 10  
Invertebrate & Vertebrate Branch 2  
Office of Pesticide Programs

Enclosures:    *Master Label Stamped "Accepted," dated 11/07/2016*  
                    *45/90 Day Screen Results for End-Use Product "A103.02," dated 08/03/2016*  
                    *Acute Toxicity Review, dated 07/05/2016*  
                    *Product Chemistry Review, dated 08/03/2016*

[Note to reviewer: [Text] in brackets denotes optional text.]

[Note to reviewer: {Text} in braces denotes where in the final label text will appear.]

## {BOOKLET FRONT PANEL LANGUAGE}

GROUP

13

INSECTICIDE

# A103.02

For Use Only On Fruiting Vegetables and Ornamental Crops Grown in Commercial Greenhouses

Active Ingredient:	(% by weight)
Chlorfenapyr*:	21.4%
Other Ingredients	78.6%
Total	100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile

Contains 2.0 pounds of chlorfenapyr per gallon.

Contains chlorfenapyr, the active ingredient used in Pylon®.

## KEEP OUT OF REACH OF CHILDREN CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See inside label booklet for First Aid, Precautionary Statements and Directions for Use.

**Manufactured For:**

Atticus, LLC

501 Cascade Pointe Lane, Suite 102

Cary, NC 27513

EPA Reg. No.: 91234-XX

EPA Est. No.:

Net Contents:

**ACCEPTED**

11/07/2016

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under

EPA Reg. No. 91234-19

## { LANGUAGE INSIDE BOOKLET }

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
IF ON SKIN	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
IF INHALED	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance; then give artificial respiration, preferably by mouth to mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
IF IN EYES	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBERS</b> Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), you may call SafetyCall® at <b>1-844-685-9173</b> , 24 hours per day, 7 days per week. For chemical emergency: spill, leak, fire, exposure or accident, you may call CHEMTREC: <b>1-800-424-9300</b> .	

**For Chemical Emergency**  
**Spill, Leak, Fire, Exposure, or Accident**  
**Call CHEMTREC Day or Night**  
**Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)**



### **Precautionary Statements**

#### **Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin. Causes moderate eye irritation. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

#### **Personal Protective Equipment (PPE)**

Some materials that are chemical-resistant to this product are listed below.

**Applicators and Other Handlers Must Wear:** (1) long-sleeved shirt and long pants; (2) chemical-resistant gloves, such as Barrier Laminate ( $\geq 14$  mils), Butyl Rubber ( $\geq 14$  mils), Nitrile Rubber ( $\geq 14$  mils), Neoprene Rubber ( $\geq 14$  mils), Polyvinyl Chloride (PVC) ( $\geq 14$  mils), or Viton ( $\geq 14$  mils); (3) shoes plus socks.

#### **In Addition, All Mixers/Loaders/Applicators of Liquids Using a Mechanically-Pressurized Handgun for Application to Fruiting Vegetables Grown in Commercial Greenhouses Must Wear:**

(1) long-sleeved shirt and long pants; (2) chemical-resistant gloves, such as Barrier Laminate ( $\geq 14$  mils), Butyl Rubber ( $\geq 14$  mils), Nitrile Rubber ( $\geq 14$  mils), Neoprene Rubber ( $\geq 14$  mils), Polyvinyl Chloride (PVC) ( $\geq 14$  mils), or Viton ( $\geq 14$  mils); (3) PF 5 respirator; and (4) shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with the product's concentrate. **Do not** reuse them.

#### **Engineering Controls Statement**

When handlers use closed systems or enclosed cabs in a manner that meets the requirements of the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240 (d) (4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

**IMPORTANT:** When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for **applicators and other handlers**, and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown.

#### **USER SAFETY RECOMMENDATIONS**

**Users should:** (1) Wash hands thoroughly before eating, drinking, chewing gum, using tobacco, or using the toilet. (2) Remove contaminated clothing/PPE immediately and then wash thoroughly and change into clean clothing. (3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### **Environmental Hazards**

This pesticide is toxic to aquatic organisms, birds, and wildlife.

This product is toxic to bees exposed to direct treatment on blooming crops or weeds. **Do not** apply this product or allow it to drift to blooming crops or weeds if bees are actively foraging in the treatment area.

**Do not** contaminate water by cleaning of equipment or when disposing of equipment washwaters or rinsate. **Do not** discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or regional office of the EPA. **Do not** discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge.

### Physical or Chemical Hazards

Do not apply this product around electrical equipment due to the possibility of shock hazard. Do not mix or allow this product to come into contact with an oxidizing agent. Hazardous chemical reaction may occur.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation

### USE RESTRICTIONS

- Do not apply A103.02 except as specified on this label.
- Do not apply A103.02 in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application.
- Do not use A103.02 on any other crops except fruiting vegetable crops and ornamental crops grown in commercial greenhouses.
- Do not contaminate food or feedstuffs.
- Do not compost any discarded plant materials that have been treated with A103.02.
- Do not apply A103.02 through any type of irrigation system.
- Do not tank mix with products that contain a label prohibition against tank mixing.
- Do not apply more than three (3) applications of A103.02 during a crop growing cycle.
- Do not use A103.02 to formulate, reformulate or repackage into any other pesticide product without the written permission of Atticus, LLC.
- Do not apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle in fruiting vegetables.
- It is unlawful to use A103.02 on anything other than ornamental crops or fruiting vegetable crops in commercial greenhouses.

### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard (WPS), 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: (1) Coveralls; (2) Chemical-resistant gloves, such as Barrier Laminate ( $\geq 14$  mils), Butyl Rubber ( $\geq 14$  mils), Nitrile Rubber ( $\geq 14$  mils), Neoprene Rubber ( $\geq 14$  mils), Polyvinyl Chloride (PVC) or Viton ( $\geq 14$  mils); (3) Shoes plus socks.

### PRODUCT INFORMATION

A103.02 is a broad-spectrum insecticide-miticide for use on greenhouse grown fruiting vegetables and greenhouse grown ornamentals. It has excellent stomach activity when ingested and good contact activity when pests come in contact with it. A103.02 is classified in a class of insecticides-miticides called Pyrroles. Members of this class of products have a similar mode of action that involves uncoupling oxidative phosphorylation and preventing conversion of ADP to ATP which affects energy metabolism so that mites

and insects cannot generate enough energy to survive.

A103.02 does not have ovicidal activity. Therefore, it should be used in combination with a registered miticide or insecticide with ovicidal activity if moderate to heavy numbers of mite or insect eggs are present at application time.

**Resistance Management:** All crop protection chemicals should be used in resistance pest management programs suitable for the crop-pest complex involved. The program should involve different classes of chemistry in the control of the pests. For more information on insect resistance, contact the local Cooperative Extension Service for suggestions on minimizing insect resistance.

When using A103.02 in greenhouses, **do not** apply more than two (2) consecutive applications before rotating to an insecticide-miticide with a different mode of action. In addition, **do not** apply A103.02 to consecutive crops in the commercial greenhouse unless applied in combination with another insecticide-miticide with a different mode of action.

**Mixing Instructions:** Agitate or shake A103.02 containers prior to use in order to prepare a uniform spray solution. Add  $\frac{1}{2}$  to  $\frac{3}{4}$  of the required amount of clean water to the spray tank and start agitation. Measure the required amount of A103.02 with a calibrated measuring device and add to the spray tank while agitating. Add the rest of the water and continue with agitation. If preparing a tank-mixture, add A103.02 to the tank first and be sure that it is fully dispersed in water before adding the additional materials. To prevent waste and disposal of used spray solution, it is best to prepare no more spray solution than is needed for the immediate operation.

**Compatibility:** Although A103.02 is compatible with many spray products, a full range of compatibilities under all local conditions has not been evaluated. Therefore, the compatibility of any mixture with A103.02 must be determined using a jar test. Conduct a jar test by adding proportionate amounts of each ingredient of the tank-mixture to a pint or quart jar. Cap, shake, and let sit for at least 15 minutes. If a precipitate forms and it cannot be readily re-dispersed, do not use the mixture because it is incompatible.

**Tank Mixing:** As stated above, if using A103.02 in a tank-mixture, always add A103.02 to the spray tank first and make sure it is fully dispersed in water before adding any other tank-mix product. Follow all applicable directions, restrictions and precautions on the label for the tank mix partners. The most restrictive labeling applies when using a tank mix. **Do not** tank mix with products that contain a label prohibition against tank mixing. **It is unlawful to tank mix A103.02 if the tank mix will be used outdoors.**

#### **FRUITING VEGETABLE CROPS GROWN IN COMMERCIAL GREENHOUSES**

A103.02 is broad-spectrum and can be used to control insect and mite pests on greenhouse grown fruiting vegetables such as eggplant, groundcherry, pepino, pepper, tomatillo and tomato. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage. A103.02 can be applied up to and including the day of harvest.

#### **Use Restrictions for Fruiting Vegetables Grown in Commercial Greenhouses**

- Apply A103.02 according to the product guidelines and restrictions stated in the "USE RESTRICTIONS" and "Resistance Management" sections of this label.
- **Do not** apply A103.02 as an ultra low volume (ULV) spray.
- Do not use on tomato varieties with a mature fruit diameter of less than one (1) inch.
- Allow at least 5 to 7 days between applications.
- **Do not** apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle in fruiting vegetables grown in commercial greenhouses.
- It is unlawful to use a tank-mixture with A103.02 outdoors.

**A103.02 Application Rates and Comments**  
**Fruiting Vegetables Grown In Commercial Greenhouses**

**Eggplant, Ground cherry, Pepinos, Peppers, Tomatillo and Tomato**

Target Pests	Rate (fl ozs/A)	Rate (lbs ai/A)	Comments
<b>Worms:</b> Alfalfa looper ( <i>Autographa californica</i> ) Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Fall armyworm ( <i>S. frugiperda</i> ) Hornworms ( <i>Manduca quinquemaculata</i> ) Southern armyworm ( <i>S. eridania</i> ) Tobacco budworm ( <i>H. virescens</i> ) Tomato fruitworm ( <i>Heliothis zea</i> ) Tomato pinworm ( <i>Keiferia lycopersicella</i> ) Yellowstriped armyworm ( <i>S. ornithogalli</i> )	6.5 to 13	0.10 to 0.20	Apply as required by scouting. Apply in a spray volume between 5 and 100 gallons per acre.  Repeat applications as needed (usually 5 to 10 days) for control, but allow at least 5-7 days between applications. Use a longer time interval when infestations are light to moderate; shorten the time interval for heavier infestations.
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.	6.5 to 13	0.10 to 0.20	Use lower rates when populations are at action thresholds and higher rates when populations are heavy and causing damage.
<b>Thrips:</b> Melon thrips ( <i>Thrips palmi</i> ) Onion thrips ( <i>Thrips tabaci</i> ) Western flower thrips ( <i>Frankliniella occidentalis</i> )	9.8 to 13	0.15 to 0.20	

**ORNAMENTAL CROPS GROWN IN COMMERCIAL GREENHOUSES**

On greenhouse ornamentals, A103.02 is broad-spectrum and controls mites, insects and foliar nematodes. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage.

**Use Restrictions for Ornamental Crops Grown in Commercial Greenhouses**

- Apply A103.02 according to the product guidelines and restrictions stated in the "USE RESTRICTIONS" and "Resistance Management" sections of this label.
- Do not apply more than 41 fl ozs of A103.02 per 100 gallons per crop per season or 0.64 lb of active ingredient per 100 gallons per crop per season in ornamentals grown in commercial greenhouses (start to finish for one ornamental crop).
- It is unlawful to use a tank-mixture with A103.02 outdoors.

**Crop Tolerance:** Although A103.02 has been shown to be safe to many ornamental species when used according to label use directions, not all ornamental plant species and cultivars have been tested for tolerance to A103.02, tank-mix combinations of A103.02, or pesticide treatments before or after those of A103.02. Also, since local conditions can influence plant tolerance, they may not match the conditions under which testing of A103.02 was conducted.

**Sensitive Ornamental Plant Species:** Some ornamental plant species have been found, under certain conditions, to be less tolerant to A103.02 when used according to label directions. Phytotoxicity is likely to occur if A103.02 is applied to the following ornamental plant species: Dianthus (*Dianthus* spp.) including

carnations, pinks and Sweet William varieties, Kalanchoe (*Kalanchoe blossfeldiana*), Poinsettia (*Euphorbia pulcherrima*), Roses (*Rosa* spp.), Salvia (*Salvia* spp.) and Zinnia (*Zinnia* spp.).

If application is made to these sensitive ornamental plant species it is made at grower risk.

Follow these suggestions to reduce potential injury to ornamentals: (1) Do not apply to plugs in their early stages of development (1 to 2 leaf) as injury to some tender crops could occur. If application to plugs is necessary, test A103.02 on a small number of plants before doing large scale treatments. (2) Apply A103.02 during the coolest parts of the day and always apply prior to blooming or avoid applications to blooms where possible. (3) Prior to application, evaluate for potential phytotoxicity of all tank mixes with additives or other pesticide products. Additives, including spray adjuvants, are not necessary for use with A103.02. Crop oils, surfactants and fertilizer adjuvants have been shown to increase the likelihood of phytotoxicity and are not recommended with A103.02. If greenhouses are under high temperature conditions, use caution whenever including an additive with A103.02 because the injury potential is higher. Do not tank mix with products that contain a label prohibition against tank mixing. Apply the tank mix to a small area (8 to 12 plants) and evaluate for 3 to 5 days before attempting a large-scale spray to make certain that no phytotoxicity occurs.

#### A103.02 Application Rates and Comments Greenhouse Grown Ornamentals

Target Pests	Rate (fl ozs/ 100 gals)	Rate (lbs ai/100 gals)	Comments
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Citrus budmite ( <i>Eriophyes sheldoni</i> ) Cyclamen mite ( <i>Phytonemus pallidus</i> ) Rust mite ( <i>Phyllocoptruta</i> spp., <i>Epitrimerus</i> spp. and <i>Aculus</i> spp.) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.)	2.6 to 5.2	0.04 to 0.08	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when mites first appear, before crop damage occurs.  Use A103.02 at 2.6 to 5.2 fl oz/100 gallons for 14 to 21 day control of low to moderate populations of mites.  Against high mite populations, or a generally high infestation across multiple crops in the same greenhouse, apply A103.02 at 5.2 fl ozs/100 gallons. Make a sequential application at 5 to 7 days after the first application to maintain control. Make only one sequential application.  A103.02 is not systemic and does not translocate throughout the plant, but it is translaminar and moves rapidly from the top to the underside of a leaf to control mites.  A103.02 will be diluted in rapidly expanding, new foliage as compared to the concentration in the leaf surface at the time of application. The sequential application mentioned above is important to maintain control.

**A103.02 Application Rates and Comments  
Greenhouse Grown Ornamentals**

<b>Target Pests</b>	<b>Rate (fl ozs/ 100 gals)</b>	<b>Rate (lbs ai/100 gals)</b>	<b>Comments</b>
<b>Worms:</b> Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Soybean looper ( <i>Pseudoplusia includes</i> )	2.6 to 6.4	0.04 to 0.10	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when worms first appear, before crop damage occurs.
Foliar nematodes ( <i>Aphelenchoides</i> spp.)	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage.  Apply an initial application at 5.2 fl ozs /100 gallons when first signs of plant damage or nematodes are observed, followed by a second application at 5.2 fl ozs/100 gallons 7 to 14 days later.  A third application at 5.2 fl ozs/100 gallons can be made at 4 to 6 weeks after the initial application if plant damage or nematodes are detected.  To improve nematode control, add an IGR (insect growth regulator) or second MOA (Mode of Action) product registered for this use as a tank mixture.
Fungus gnats ( <i>Bradysia</i> spp.)	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when fungus gnats are in the early larval stage.  A103.02 will not control emerged adults, therefore, add an IGR or second MOA product registered for this use as a tank mixture.
<b>Thrips:</b> Chilli thrips ( <i>Scirtothrips dorsalis</i> Hood) Western flower thrips ( <i>Frankliniella occidentalis</i> )	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage.  Apply when thrips are immature and when populations are building, before crop damage occurs.  Western flower thrips are difficult to control because they may be concealed in blooms. Combinations with other effective insecticides will enhance overall control.  Alternation with other MOA products such as <b>Overture® 35 WP insecticide</b> or <b>Mesuro® 75-W</b> can help prevent resistance development. Incorporate an IGR such as <b>Pedestal® novaluron insecticide</b> in your spray program.

#### STORAGE AND DISPOSAL

**Do not** contaminate water, food or feed by storage or disposal.

##### **Pesticide Storage**

Keep A103.02 in its tightly closed original container, when not in use. **Do not** store below 32° F. **Do not** store in direct sunlight. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

##### **Pesticide Disposal**

Wastes resulting from the use of A103.02 may be disposed of on-site or at an approved waste disposal facility.

##### **Container Disposal**

**Nonrefillable Container:** **Do not reuse or refill this container.** Triple rinse or pressure rinse container (or equivalent) promptly after emptying (see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons) as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and contain the spill with inert material (sand, earth, etc.) and transfer liquid and solid diking material to separate containers for disposal. Keep the spill out of all sewers and open bodies of water.

#### LIMITATION OF WARRANTY AND LIABILITY

**IMPORTANT: READ BEFORE USE.** Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of ATTICUS, LLC. All such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** To the extent consistent with applicable law, ATTICUS, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

**LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, neither ATTICUS, LLC the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent

with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

Mesuroi is a registered trademark of Bayer AG, Germany

Overture is a registered trademark of Valent U.S.A. Corporation

Pedestal is a registered trademark of Makhteshim Agan of North America.

A103.02 is not manufactured or distributed by BASF Corporation, seller of Pylon®.

Pylon® is a registered trademark of BASF Corporation.



**{LANGUAGE ON LABEL AFFIXED TO  
CONTAINER}**

**A103.02**

**For Use Only On Fruiting Vegetables and Ornamental Crops Grown  
in Commercial Greenhouses**

**Active Ingredient:**

(% by weight)

Chlorfenapyr\* ..... 21.4%  
Other Ingredients ..... 78.6%  
Total ..... 100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-  
pyrrole-3-carbonitrile  
Contains 2.0 pounds of chlorfenapyr per gallon.  
Contains chlorfenapyr, the active ingredient used in Pylon®.

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

Si usted no entiende la etiqueta, busque a alguien para que se la  
explique a usted en detalle. (If you do not understand the label, find  
someone to explain it to you in detail.)

**Precautionary Statements**

**Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin.  
Causes moderate eye irritation. Avoid breathing vapors or spray mist.  
Avoid contact with skin, eyes or clothing. Wash hands thoroughly with  
soap and water after handling and before eating, drinking, chewing gum,  
using tobacco, or using the toilet. Remove and wash contaminated  
clothing before reuse.

**STORAGE AND DISPOSAL**

**Do not** contaminate water, food or feed by storage or disposal.

**Pesticide Storage**

Keep A103.02 in its tightly closed original container, when not in use. **Do  
not** store below 32° F. **Do not** store in direct sunlight. Store in a cool, dry  
(preferably locked) area that is inaccessible to children and animals.

**Pesticide Disposal**

Wastes resulting from the use of A103.02 may be disposed of on-site or  
at an approved waste disposal facility.

**Container Disposal**

**Nonrefillable Container:** **Do not reuse or refill this container.** Triple  
rinse or pressure rinse container (or equivalent) promptly after emptying  
(see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons)  
as follows:** Empty the remaining contents into application equipment or a  
mix tank and drain for 10 seconds after the flow begins to drip. Fill the  
container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate  
into application equipment or a mix tank, or store rinsate for later use or  
disposal. Drain for 10 seconds after the flow begins to drip. Repeat this  
procedure two more times. Offer for recycling if available for  
reconditioning if appropriate, or puncture and dispose of in a sanitary  
landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into  
application equipment or mix tank and continue to drain for 10 seconds  
after the flow begins to drip. Hold container upside down over application  
equipment or mix tank, or collect rinsate for later use or disposal. Insert  
pressure rinsing nozzle in the side of the container and rinse at about 40  
PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to  
drip. Offer for recycling if available for reconditioning if appropriate, or  
puncture and dispose of in a sanitary landfill, or by other procedures  
approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and  
contain the spill with inert material (sand, earth, etc.) and transfer liquid  
and solid diking material to separate containers for disposal. Keep the  
spill out of all sewers and open bodies of water.

See label booklet for First Aid, additional Precautionary Statements and  
Directions for Use.

*[Note to reviewer: The label booklet shall be securely attached to the  
immediate container]*

**Manufactured For:**

Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

**EPA Reg. No.: 91234-XX  
EPA Est. No.:**

**Net Contents:**

## Rodia, Carmen

---

**From:** Nicole O'Loughlin <Nicole@PyxisRC.com>  
**Sent:** Monday, November 07, 2016 12:38 PM  
**To:** Rodia, Carmen  
**Cc:** McCall, Deborah; Gebken, Richard; Walsh, Michael  
**Subject:** RE: Secondary Label Review Comments for EPA File Symbol 91234-RO (A103.02)  
**Attachments:** 091234-xxxxx.20161107 A103.02 Label\_clean.pdf; 091234-xxxxx.20161107 A103.02 Label\_tracked.pdf

Carmen,

Good catch. The last comment has been incorporated in the attached.

Regards,  
Nicole

**Nicole O'Loughlin**  
**Pyxis Regulatory Consulting, Inc.**  
4110 136th St. Ct. NW  
Gig Harbor, WA 98332  
(T): (253) 853-7369  
(F): (253) 853-5516  
(E): [Nicole@PyxisRC.com](mailto:Nicole@PyxisRC.com)

---

**From:** Rodia, Carmen [<mailto:Rodia.Carmen@epa.gov>]  
**Sent:** Monday, November 07, 2016 9:27 AM  
**To:** Nicole O'Loughlin <Nicole@PyxisRC.com>  
**Cc:** McCall, Deborah <McCall.Deborah@epa.gov>; Gebken, Richard <Gebken.Richard@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>  
**Subject:** RE: Secondary Label Review Comments for EPA File Symbol 91234-RO (A103.02)

Nicole, please see the attached FINAL marked up version of the master label that you just submitted to me. You need to make this one last label change to both listings of the PVC chemical-resistant glove description within the PPE section, and then we can move forward with the registration this afternoon. Regards, Carmen.

*Carmen J. Rodia, Jr.*

Carmen J. Rodia, Jr.  
Environmental Protection Specialist  
U.S. EPA, Office of Pesticide Programs,  
Registration Division, Invertebrate & Vertebrate Branch 2  
1200 Pennsylvania Avenue, NW (7504P)  
Washington, DC 20460-0001  
(703) 306-0327 (tel)  
(703) 308-0029 (fax)  
[Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov)

---

**From:** Nicole O'Loughlin [<mailto:Nicole@PyxisRC.com>]  
**Sent:** Monday, November 07, 2016 12:19 PM  
**To:** Rodia, Carmen <[Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov)>  
**Cc:** McCall, Deborah <[McCall.Deborah@epa.gov](mailto:McCall.Deborah@epa.gov)>; Gebken, Richard <[Gebken.Richard@epa.gov](mailto:Gebken.Richard@epa.gov)>; Walsh, Michael <[Walsh.Michael@epa.gov](mailto:Walsh.Michael@epa.gov)>  
**Subject:** RE: Secondary Label Review Comments for EPA File Symbol 91234-RO (A103.02)

Carmen,

I have added the additional language to the PPE section of the label. Please see the attached and let me know if you need anything else.

Regards,  
Nicole

**Nicole O'Loughlin**  
**Pyxis Regulatory Consulting, Inc.**  
4110 136th St. Ct. NW  
Gig Harbor, WA 98332  
(T): (253) 853-7369  
(F): (253) 853-5516  
(E): [Nicole@PyxisRC.com](mailto:Nicole@PyxisRC.com)

---

**From:** Rodia, Carmen [<mailto:Rodia.Carmen@epa.gov>]  
**Sent:** Monday, November 07, 2016 8:12 AM  
**To:** Nicole O'Loughlin <[Nicole@PyxisRC.com](mailto:Nicole@PyxisRC.com)>  
**Cc:** McCall, Deborah <[McCall.Deborah@epa.gov](mailto:McCall.Deborah@epa.gov)>; Gebken, Richard <[Gebken.Richard@epa.gov](mailto:Gebken.Richard@epa.gov)>; Walsh, Michael <[Walsh.Michael@epa.gov](mailto:Walsh.Michael@epa.gov)>  
**Subject:** Secondary Label Review Comments for EPA File Symbol 91234-RO (A103.02)

Nicole, in anticipation of stamping a "clean label" with no comments later today in support of the R301 pending new product registration for EPA File Symbol 91234-RO (A103.02), I have incorporated a few remaining secondary label review comments within the PPE section that will need to be worked into a further updated master label. The referenced secondary label review comments are related to required mitigation listed in the interim decision document supporting the registration review for chlorfenapyr.

**PLEASE NOTE: The PRIA conclusion date for this R301 pending new product registration is today, Monday, November 7, 2016, and I will need you to submit the further updated master label as soon as possible so that we can meet your PRIA date for this new product.**

If you have any questions, please contact me directly. Once the master label has been further updated, please e-mail it to me for use in completing the new product registration later TODAY. Regards, Carmen Rodia.

*Carmen J. Rodia, Jr.*

Carmen J. Rodia, Jr.  
Environmental Protection Specialist  
U.S. EPA, Office of Pesticide Programs,  
Registration Division, Invertebrate & Vertebrate Branch 2  
1200 Pennsylvania Avenue, NW (7504P)  
Washington, DC 20460-0001  
(703) 306-0327 (tel)  
(703) 308-0029 (fax)  
[Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov)

[Note to reviewer: [Text] in brackets denotes optional text.]

[Note to reviewer: {Text} in braces denotes where in the final label text will appear.]

## {BOOKLET FRONT PANEL LANGUAGE}

GROUP

13

INSECTICIDE

# A103.02

For Use Only On Fruiting Vegetables and Ornamental Crops Grown in Commercial Greenhouses

Active Ingredient:	(% by weight)
Chlorfenapyr*:	21.4%
Other Ingredients	78.6%
Total	100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile

Contains 2.0 pounds of chlorfenapyr per gallon.

Contains chlorfenapyr, the active ingredient used in Pylon®.

## KEEP OUT OF REACH OF CHILDREN CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See inside label booklet for First Aid, Precautionary Statements and Directions for Use.

Manufactured For:  
Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

EPA Reg. No.: 91234-XX  
EPA Est. No.:

Net Contents:

## { LANGUAGE INSIDE BOOKLET }

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
IF ON SKIN	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
IF INHALED	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance; then give artificial respiration, preferably by mouth to mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
IF IN EYES	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>HOT LINE NUMBERS</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), you may call SafetyCall® at 1-844-685-9173, 24 hours per day, 7 days per week. For chemical emergency: spill, leak, fire, exposure or accident, you may call CHEMTREC: 1-800-424-9300.	

**For Chemical Emergency**  
**Spill, Leak, Fire, Exposure, or Accident**  
**Call CHEMTREC Day or Night**  
**Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)**

**Precautionary Statements**  
**Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin. Causes moderate eye irritation. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

**Personal Protective Equipment (PPE)**

Some materials that are chemical-resistant to this product are listed below.

**Applicators and Other Handlers Must Wear:** (1) long-sleeved shirt and long pants; (2) chemical-resistant gloves, such as Barrier Laminate ( $\geq 14$  mils), Butyl Rubber ( $\geq 14$  mils), Nitrile Rubber ( $\geq 14$  mils), Neoprene Rubber ( $\geq 14$  mils), Polyvinyl Chloride (PVC) ( $\geq 14$  mils), or Viton ( $\geq 14$  mils); (3) shoes plus socks.

**In Addition, All Mixers/Loaders/Applicators of Liquids Using a Mechanically-Pressurized Handgun for Application to Fruiting Vegetables Grown in Commercial Greenhouses Must Wear:**

(1) long-sleeved shirt and long pants; (2) chemical-resistant gloves, such as Barrier Laminate ( $\geq 14$  mils), Butyl Rubber ( $\geq 14$  mils), Nitrile Rubber ( $\geq 14$  mils), Neoprene Rubber ( $\geq 14$  mils), Polyvinyl Chloride (PVC) ( $\geq 14$  mils), or Viton ( $\geq 14$  mils); (3) PF 5 respirator; and (4) shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with the product's concentrate. **Do not** reuse them.

**Engineering Controls Statement**

When handlers use closed systems or enclosed cabs in a manner that meets the requirements of the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240 (d) (4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

**IMPORTANT:** When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for **applicators and other handlers**, and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown.

**USER SAFETY RECOMMENDATIONS**

**Users should:** (1) Wash hands thoroughly before eating, drinking, chewing gum, using tobacco, or using the toilet. (2) Remove contaminated clothing/PPE immediately and then wash thoroughly and change into clean clothing. (3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**Environmental Hazards**

This pesticide is toxic to aquatic organisms, birds, and wildlife.

This product is toxic to bees exposed to direct treatment on blooming crops or weeds. **Do not** apply this product or allow it to drift to blooming crops or weeds if bees are actively foraging in the treatment area.

**Do not** contaminate water by cleaning of equipment or when disposing of equipment washwaters or rinsate. **Do not** discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or regional office of the EPA. **Do not** discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge.

### Physical or Chemical Hazards

Do not apply this product around electrical equipment due to the possibility of shock hazard. Do not mix or allow this product to come into contact with an oxidizing agent. Hazardous chemical reaction may occur.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation

### USE RESTRICTIONS

- Do not apply A103.02 except as specified on this label.
- Do not apply A103.02 in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application.
- Do not use A103.02 on any other crops except fruiting vegetable crops and ornamental crops grown in commercial greenhouses.
- Do not contaminate food or feedstuffs.
- Do not compost any discarded plant materials that have been treated with A103.02.
- Do not apply A103.02 through any type of irrigation system.
- Do not tank mix with products that contain a label prohibition against tank mixing.
- Do not apply more than three (3) applications of A103.02 during a crop growing cycle.
- Do not use A103.02 to formulate, reformulate or repackage into any other pesticide product without the written permission of Atticus, LLC.
- Do not apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle in fruiting vegetables.
- It is unlawful to use A103.02 on anything other than ornamental crops or fruiting vegetable crops in commercial greenhouses.

### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard (WPS), 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: (1) Coveralls; (2) Chemical-resistant gloves, such as Barrier Laminate ( $\geq 14$  mils), Butyl Rubber ( $\geq 14$  mils), Nitrile Rubber ( $\geq 14$  mils), Neoprene Rubber ( $\geq 14$  mils), Polyvinyl Chloride (PVC) or Viton ( $\geq 14$  mils); (3) Shoes plus socks.

### PRODUCT INFORMATION

A103.02 is a broad-spectrum insecticide-miticide for use on greenhouse grown fruiting vegetables and greenhouse grown ornamentals. It has excellent stomach activity when ingested and good contact activity when pests come in contact with it. A103.02 is classified in a class of insecticides-miticides called Pyrroles. Members of this class of products have a similar mode of action that involves uncoupling oxidative phosphorylation and preventing conversion of ADP to ATP which affects energy metabolism so that mites

and insects cannot generate enough energy to survive.

A103.02 does not have ovicidal activity. Therefore, it should be used in combination with a registered miticide or insecticide with ovicidal activity if moderate to heavy numbers of mite or insect eggs are present at application time.

**Resistance Management:** All crop protection chemicals should be used in resistance pest management programs suitable for the crop-pest complex involved. The program should involve different classes of chemistry in the control of the pests. For more information on insect resistance, contact the local Cooperative Extension Service for suggestions on minimizing insect resistance.

When using A103.02 in greenhouses, **do not** apply more than two (2) consecutive applications before rotating to an insecticide-miticide with a different mode of action. In addition, **do not** apply A103.02 to consecutive crops in the commercial greenhouse unless applied in combination with another insecticide-miticide with a different mode of action.

**Mixing Instructions:** Agitate or shake A103.02 containers prior to use in order to prepare a uniform spray solution. Add ½ to ¾ of the required amount of clean water to the spray tank and start agitation. Measure the required amount of A103.02 with a calibrated measuring device and add to the spray tank while agitating. Add the rest of the water and continue with agitation. If preparing a tank-mixture, add A103.02 to the tank first and be sure that it is fully dispersed in water before adding the additional materials. To prevent waste and disposal of used spray solution, it is best to prepare no more spray solution than is needed for the immediate operation.

**Compatibility:** Although A103.02 is compatible with many spray products, a full range of compatibilities under all local conditions has not been evaluated. Therefore, the compatibility of any mixture with A103.02 must be determined using a jar test. Conduct a jar test by adding proportionate amounts of each ingredient of the tank-mixture to a pint or quart jar. Cap, shake, and let sit for at least 15 minutes. If a precipitate forms and it cannot be readily re-dispersed, do not use the mixture because it is incompatible.

**Tank Mixing:** As stated above, if using A103.02 in a tank-mixture, always add A103.02 to the spray tank first and make sure it is fully dispersed in water before adding any other tank-mix product. Follow all applicable directions, restrictions and precautions on the label for the tank mix partners. The most restrictive labeling applies when using a tank mix. **Do not** tank mix with products that contain a label prohibition against tank mixing. **It is unlawful to tank mix A103.02 if the tank mix will be used outdoors.**

#### **FRUITING VEGETABLE CROPS GROWN IN COMMERCIAL GREENHOUSES**

A103.02 is broad-spectrum and can be used to control insect and mite pests on greenhouse grown fruiting vegetables such as eggplant, groundcherry, pepino, pepper, tomatillo and tomato. If multiple pests are present, **always** use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage. A103.02 can be applied up to and including the day of harvest.

#### **Use Restrictions for Fruiting Vegetables Grown in Commercial Greenhouses**

- Apply A103.02 according to the product guidelines and restrictions stated in the "USE RESTRICTIONS" and "Resistance Management" sections of this label.
- **Do not** apply A103.02 as an ultra low volume (ULV) spray.
- Do not use on tomato varieties with a mature fruit diameter of less than one (1) inch.
- Allow at least 5 to 7 days between applications.
- **Do not** apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle in fruiting vegetables grown in commercial greenhouses.
- It is unlawful to use a tank-mixture with A103.02 outdoors.



**A103.02 Application Rates and Comments  
Fruiting Vegetables Grown In Commercial Greenhouses**

**Eggplant, Ground cherry, Pepinos, Peppers, Tomatillo and Tomato**

Target Pests	Rate (fl ozs/A)	Rate (lbs ai/A)	Comments
<b>Worms:</b> Alfalfa looper ( <i>Autographa californica</i> ) Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Fall armyworm ( <i>S. frugiperda</i> ) Hornworms ( <i>Manduca quinquemaculata</i> ) Southern armyworm ( <i>S. eridania</i> ) Tobacco budworm ( <i>H. virescens</i> ) Tomato fruitworm ( <i>Heliothis zea</i> ) Tomato pinworm ( <i>Keiferia lycopersicella</i> ) Yellowstriped armyworm ( <i>S. omithogalli</i> )	6.5 to 13	0.10 to 0.20	Apply as required by scouting. Apply in a spray volume between 5 and 100 gallons per acre.  Repeat applications as needed (usually 5 to 10 days) for control, but allow at least 5-7 days between applications. Use a longer time interval when infestations are light to moderate; shorten the time interval for heavier infestations.
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.)	6.5 to 13	0.10 to 0.20	Use lower rates when populations are at action thresholds and higher rates when populations are heavy and causing damage.
<b>Thrips:</b> Melon thrips ( <i>Thrips palmi</i> ) Onion thrips ( <i>Thrips tabaci</i> ) Western flower thrips ( <i>Frankliniella occidentalis</i> )	9.8 to 13	0.15 to 0.20	

**ORNAMENTAL CROPS GROWN IN COMMERCIAL GREENHOUSES**

On greenhouse ornamentals, A103.02 is broad-spectrum and controls mites, insects and foliar nematodes. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage.

**Use Restrictions for Ornamental Crops Grown in Commercial Greenhouses**

- Apply A103.02 according to the product guidelines and restrictions stated in the "USE RESTRICTIONS" and "Resistance Management" sections of this label.
- Do not apply more than 41 fl ozs of A103.02 per 100 gallons per crop per season or 0.64 lb of active ingredient per 100 gallons per crop per season in ornamentals grown in commercial greenhouses (start to finish for one ornamental crop).
- It is unlawful to use a tank-mixture with A103.02 outdoors.

**Crop Tolerance:** Although A103.02 has been shown to be safe to many ornamental species when used according to label use directions, not all ornamental plant species and cultivars have been tested for tolerance to A103.02, tank-mix combinations of A103.02, or pesticide treatments before or after those of A103.02. Also, since local conditions can influence plant tolerance, they may not match the conditions under which testing of A103.02 was conducted.

**Sensitive Ornamental Plant Species:** Some ornamental plant species have been found, under certain conditions, to be less tolerant to A103.02 when used according to label directions. Phytotoxicity is likely to occur if A103.02 is applied to the following ornamental plant species: Dianthus (*Dianthus* spp.) including

carnations, pinks and Sweet William varieties, Kalanchoe (*Kalanchoe blossfeldiana*), Poinsettia (*Euphorbia pulcherrima*), Roses (*Rosa* spp.), Salvia (*Salvia* spp.) and Zinnia (*Zinnia* spp.).

If application is made to these sensitive ornamental plant species it is made at grower risk.

Follow these suggestions to reduce potential injury to ornamentals: (1) Do not apply to plugs in their early stages of development (1 to 2 leaf) as injury to some tender crops could occur. If application to plugs is necessary, test A103.02 on a small number of plants before doing large scale treatments. (2) Apply A103.02 during the coolest parts of the day and always apply prior to blooming or avoid applications to blooms where possible. (3) Prior to application, evaluate for potential phytotoxicity of all tank mixes with additives or other pesticide products. Additives, including spray adjuvants, are not necessary for use with A103.02. Crop oils, surfactants and fertilizer adjuvants have been shown to increase the likelihood of phytotoxicity and are not recommended with A103.02. If greenhouses are under high temperature conditions, use caution whenever including an additive with A103.02 because the injury potential is higher. Do not tank mix with products that contain a label prohibition against tank mixing. Apply the tank mix to a small area (8 to 12 plants) and evaluate for 3 to 5 days before attempting a large-scale spray to make certain that no phytotoxicity occurs.

#### A103.02 Application Rates and Comments Greenhouse Grown Ornamentals

Target Pests	Rate (fl ozs/ 100 gals)	Rate (lbs ai/100 gals)	Comments
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Citrus budmite ( <i>Eriophyes sheldoni</i> ) Cyclamen mite ( <i>Phytonemus pallidus</i> ) Rust mite ( <i>Phyllocoptruta</i> spp., <i>Epitrimerus</i> spp. and <i>Aculus</i> spp.) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.)	2.6 to 5.2	0.04 to 0.08	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when mites first appear, before crop damage occurs.  Use A103.02 at 2.6 to 5.2 fl oz/100 gallons for 14 to 21 day control of low to moderate populations of mites.  Against high mite populations, or a generally high infestation across multiple crops in the same greenhouse, apply A103.02 at 5.2 fl ozs/100 gallons. Make a sequential application at 5 to 7 days after the first application to maintain control. Make only one sequential application.  A103.02 is not systemic and does not translocate throughout the plant, but it is translaminar and moves rapidly from the top to the underside of a leaf to control mites.  A103.02 will be diluted in rapidly expanding, new foliage as compared to the concentration in the leaf surface at the time of application. The sequential application mentioned above is important to maintain control.

**A103.02 Application Rates and Comments  
Greenhouse Grown Ornamentals**

<b>Target Pests</b>	<b>Rate (fl ozs/ 100 gals)</b>	<b>Rate (lbs ai/100 gals)</b>	<b>Comments</b>
<b>Worms:</b> Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Soybean looper ( <i>Pseudoplusia includes</i> )	2.6 to 6.4	0.04 to 0.10	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when worms first appear, before crop damage occurs.
Foliar nematodes ( <i>Aphelenchoides</i> spp.)	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage.  Apply an initial application at 5.2 fl ozs /100 gallons when first signs of plant damage or nematodes are observed, followed by a second application at 5.2 fl ozs/100 gallons 7 to 14 days later.  A third application at 5.2 fl ozs/100 gallons can be made at 4 to 6 weeks after the initial application if plant damage or nematodes are detected.  To improve nematode control, add an IGR (insect growth regulator) or second MOA (Mode of Action) product registered for this use as a tank mixture.
Fungus gnats ( <i>Bradysia</i> spp.)	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when fungus gnats are in the early larval stage.  A103.02 will not control emerged adults, therefore, add an IGR or second MOA product registered for this use as a tank mixture.
<b>Thrips:</b> Chilli thrips ( <i>Scirtothrips dorsalis</i> Hood) Western flower thrips ( <i>Frankliniella occidentalis</i> )	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage.  Apply when thrips are immature and when populations are building, before crop damage occurs.  Western flower thrips are difficult to control because they may be concealed in blooms. Combinations with other effective insecticides will enhance overall control.  Alternation with other MOA products such as <b>Overture® 35 WP insecticide</b> or <b>Mesuro® 75-W</b> can help prevent resistance development. Incorporate an IGR such as <b>Pedestal® novaluron insecticide</b> in your spray program.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

#### Pesticide Storage

Keep A103.02 in its tightly closed original container, when not in use. Do not store below 32° F. Do not store in direct sunlight. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

#### Pesticide Disposal

Wastes resulting from the use of A103.02 may be disposed of on-site or at an approved waste disposal facility.

#### Container Disposal

**Nonrefillable Container:** Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying (see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons) as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and contain the spill with inert material (sand, earth, etc.) and transfer liquid and solid diking material to separate containers for disposal. Keep the spill out of all sewers and open bodies of water.

### LIMITATION OF WARRANTY AND LIABILITY

**IMPORTANT: READ BEFORE USE.** Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of ATTICUS, LLC. All such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** To the extent consistent with applicable law, ATTICUS, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

**LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, neither ATTICUS, LLC the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent

with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

MesuroI is a registered trademark of Bayer AG, Germany

Overture is a registered trademark of Valent U.S.A. Corporation

Pedestal is a registered trademark of Makhteshim Agan of North America.

A103.02 is not manufactured or distributed by BASF Corporation, seller of Pylon®.

Pylon® is a registered trademark of BASF Corporation.

**{LANGUAGE ON LABEL AFFIXED TO CONTAINER}**

**A103.02**

**For Use Only On Fruiting Vegetables and Ornamental Crops Grown in Commercial Greenhouses**

**Active Ingredient:**

(% by weight)

Chlorfenapyr\*: ..... 21.4%  
Other Ingredients ..... 78.6%  
Total ..... 100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile  
Contains 2.0 pounds of chlorfenapyr per gallon.  
Contains chlorfenapyr, the active ingredient used in Pylon®.

See label booklet for First Aid, additional Precautionary Statements and Directions for Use.

[Note to reviewer: The label booklet shall be securely attached to the immediate container]

**Manufactured For:**

Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

**EPA Reg. No.: 91234-XX**

**EPA Est. No.:**

**Net Contents:**

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

**Precautionary Statements**

**Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin. Causes moderate eye irritation. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

**STORAGE AND DISPOSAL**

**Do not** contaminate water, food or feed by storage or disposal.

**Pesticide Storage**

Keep A103.02 in its tightly closed original container, when not in use. **Do not** store below 32° F. **Do not** store in direct sunlight. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

**Pesticide Disposal**

Wastes resulting from the use of A103.02 may be disposed of on-site or at an approved waste disposal facility.

**Container Disposal**

**Nonrefillable Container:** **Do not reuse or refill this container.** Triple-rinse or pressure rinse container (or equivalent) promptly after emptying (see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons) as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and contain the spill with inert material (sand, earth, etc.) and transfer liquid and solid diking material to separate containers for disposal. Keep the spill out of all sewers and open bodies of water.

## Rodia, Carmen

---

**From:** Rodia, Carmen  
**Sent:** Monday, November 07, 2016 12:26 PM  
**To:** 'Nicole O'Loughlin'  
**Cc:** McCall, Deborah; Gebken, Richard; Walsh, Michael  
**Subject:** RE: Secondary Label Review Comments for EPA File Symbol 91234-RO (A103.02)  
**Attachments:** 91234-19 (A103.02), Marked Up Label #2 (11-07-16).pdf

Nicole, please see the attached FINAL marked up version of the master label that you just submitted to me. You need to make this one last label change to both listings of the PVC chemical-resistant glove description within the PPE section, and then we can move forward with the registration this afternoon. Regards, Carmen.

*Carmen J. Rodia, Jr.*

Carmen J. Rodia, Jr.  
Environmental Protection Specialist  
U.S. EPA, Office of Pesticide Programs,  
Registration Division, Invertebrate & Vertebrate Branch 2  
1200 Pennsylvania Avenue, NW (7504P)  
Washington, DC 20460-0001  
(703) 306-0327 (tel)  
(703) 308-0029 (fax)  
[Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov)

---

**From:** Nicole O'Loughlin [<mailto:Nicole@PyxisRC.com>]  
**Sent:** Monday, November 07, 2016 12:19 PM  
**To:** Rodia, Carmen <[Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov)>  
**Cc:** McCall, Deborah <[McCall.Deborah@epa.gov](mailto:McCall.Deborah@epa.gov)>; Gebken, Richard <[Gebken.Richard@epa.gov](mailto:Gebken.Richard@epa.gov)>; Walsh, Michael <[Walsh.Michael@epa.gov](mailto:Walsh.Michael@epa.gov)>  
**Subject:** RE: Secondary Label Review Comments for EPA File Symbol 91234-RO (A103.02)

Carmen,

I have added the additional language to the PPE section of the label. Please see the attached and let me know if you need anything else.

Regards,  
Nicole

**Nicole O'Loughlin**  
**Pyxis Regulatory Consulting, Inc.**  
4110 136th St. Ct. NW  
Gig Harbor, WA 98332  
(T): (253) 853-7369  
(F): (253) 853-5516  
(E): [Nicole@PyxisRC.com](mailto:Nicole@PyxisRC.com)

---

**From:** Rodia, Carmen [<mailto:Rodia.Carmen@epa.gov>]  
**Sent:** Monday, November 07, 2016 8:12 AM  
**To:** Nicole O'Loughlin <[Nicole@PyxisRC.com](mailto:Nicole@PyxisRC.com)>  
**Cc:** McCall, Deborah <[McCall.Deborah@epa.gov](mailto:McCall.Deborah@epa.gov)>; Gebken, Richard <[Gebken.Richard@epa.gov](mailto:Gebken.Richard@epa.gov)>; Walsh, Michael <[Walsh.Michael@epa.gov](mailto:Walsh.Michael@epa.gov)>  
**Subject:** Secondary Label Review Comments for EPA File Symbol 91234-RO (A103.02)

Nicole, in anticipation of stamping a "clean label" with no comments later today in support of the R301 pending new product registration for EPA File Symbol 91234-RO (A103.02), I have incorporated a few remaining secondary label review comments within the PPE section that will need to be worked into a further updated master label. The referenced secondary label review comments are related to required mitigation listed in the interim decision document supporting the registration review for chlorfenapyr.

**PLEASE NOTE: The PRIA conclusion date for this R301 pending new product registration is today, Monday, November 7, 2016, and I will need you to submit the further updated master label as soon as possible so that we can meet your PRIA date for this new product.**

If you have any questions, please contact me directly. Once the master label has been further updated, please e-mail it to me for use in completing the new product registration later TODAY. Regards, Carmen Rodia.

*Carmen J. Rodia, Jr.*

Carmen J. Rodia, Jr.  
Environmental Protection Specialist  
U.S. EPA, Office of Pesticide Programs,  
Registration Division, Invertebrate & Vertebrate Branch 2  
1200 Pennsylvania Avenue, NW (7504P)  
Washington, DC 20460-0001  
(703) 306-0327 (tel)  
(703) 308-0029 (fax)  
[Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov)



[Note to reviewer: [Text] in brackets denotes optional text.]

[Note to reviewer: {Text} in braces denotes where in the final label text will appear.]

## {BOOKLET FRONT PANEL LANGUAGE}

GROUP

13

INSECTICIDE

# A103.02

For Use Only On Fruiting Vegetables and Ornamental Crops Grown in Commercial Greenhouses

Active Ingredient:	(% by weight)
Chlorfenapyr*:	21.4%
Other Ingredients:	78.6%
Total:	100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile

Contains 2.0 pounds of chlorfenapyr per gallon.

Contains chlorfenapyr, the active ingredient used in Pylon®.

## KEEP OUT OF REACH OF CHILDREN CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See inside label booklet for First Aid, Precautionary Statements and Directions for Use.

### Manufactured For:

Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

EPA Reg. No.: 91234-XX

EPA Est. No.:

Net Contents:

## { LANGUAGE INSIDE BOOKLET }

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
IF ON SKIN	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
IF INHALED	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance; then give artificial respiration, preferably by mouth to mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
IF IN EYES	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>HOT LINE NUMBERS</b> Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), you may call SafetyCall® at 1-844-685-9173, 24 hours per day, 7 days per week. For chemical emergency: spill, leak, fire, exposure or accident, you may call CHEMTREC: 1-800-424-9300.	

**For Chemical Emergency**  
**Spill, Leak, Fire, Exposure, or Accident**  
**Call CHEMTREC Day or Night**  
**Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)**

### Precautionary Statements

#### Hazards to Humans and Domestic Animals

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin. Causes moderate eye irritation. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

#### Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below.

**Applicators and Other Handlers Must Wear:** (1) long-sleeved shirt and long pants; (2) chemical-resistant gloves, such as Barrier Laminate ( $\geq 14$  mils), Butyl Rubber ( $\geq 14$  mils), Nitrile Rubber ( $\geq 14$  mils), Neoprene Rubber ( $\geq 14$  mils), Polyvinyl Chloride (PVC), Viton ( $\geq 14$  mils); (3) shoes plus socks.

#### In Addition, All Mixers/Loaders/Applicators of Liquids Using a Mechanically-Pressurized Handgun for Application to Fruiting Vegetables Grown in Commercial Greenhouses Must Wear:

(1) long-sleeved shirt and long pants; (2) chemical-resistant gloves, such as Barrier Laminate ( $\geq 14$  mils), Butyl Rubber ( $\geq 14$  mils), Nitrile Rubber ( $\geq 14$  mils), Neoprene Rubber ( $\geq 14$  mils), Polyvinyl Chloride (PVC), Viton ( $\geq 14$  mils); (3) PF-5 respirator; and (4) shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with the product's concentrate. **Do not** reuse them.

#### Engineering Controls Statement

When handlers use closed systems or enclosed cabs in a manner that meets the requirements of the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240 (d) (4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

**IMPORTANT:** When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for **applicators and other handlers**, and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown.

#### USER SAFETY RECOMMENDATIONS

**Users should:** (1) Wash hands thoroughly before eating, drinking, chewing gum, using tobacco, or using the toilet. (2) Remove contaminated clothing/PPE immediately and then wash thoroughly and change into clean clothing. (3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### Environmental Hazards

This pesticide is toxic to aquatic organisms, birds, and wildlife.

This product is toxic to bees exposed to direct treatment on blooming crops or weeds. **Do not** apply this product or allow it to drift to blooming crops or weeds if bees are actively foraging in the treatment area.

**Do not** contaminate water by cleaning of equipment or when disposing of equipment washwaters or rinsate. **Do not** discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or regional office of the EPA. **Do not** discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge.

# Summary of Comments on US EPA, Pesticide Product Label

Page: 3

---

Number: 1 (> 14 mils),	Author: crodia	Subject: Inserted Text	Date: 11/7/2016 12:22:46 PM
---------------------------	----------------	------------------------	-----------------------------

---

Number: 2 (> 14 mils),	Author: crodia	Subject: Inserted Text	Date: 11/7/2016 12:22:57 PM
---------------------------	----------------	------------------------	-----------------------------

---

### Physical or Chemical Hazards

Do not apply this product around electrical equipment due to the possibility of shock hazard. Do not mix or allow this product to come into contact with an oxidizing agent. Hazardous chemical reaction may occur.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation

### USE RESTRICTIONS

- Do not apply A103.02 except as specified on this label.
- Do not apply A103.02 in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application.
- Do not use A103.02 on any other crops except fruiting vegetable crops and ornamental crops grown in commercial greenhouses.
- Do not contaminate food or feedstuffs.
- Do not compost any discarded plant materials that have been treated with A103.02.
- Do not apply A103.02 through any type of irrigation system.
- Do not tank mix with products that contain a label prohibition against tank mixing.
- Do not apply more than three (3) applications of A103.02 during a crop growing cycle.
- Do not use A103.02 to formulate, reformulate or repackage into any other pesticide product without the written permission of Atticus, LLC.
- Do not apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle in fruiting vegetables.
- It is unlawful to use A103.02 on anything other than ornamental crops or fruiting vegetable crops in commercial greenhouses.

### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard (WPS), 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval.

**Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.**

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: (1) Coveralls; (2) Chemical-resistant gloves, such as Barrier Laminate ( $\geq 14$  mils), Butyl Rubber ( $\geq 14$  mils), Nitrile Rubber ( $\geq 14$  mils), Neoprene Rubber ( $\geq 14$  mils), Polyvinyl Chloride (PVC) or Viton ( $\geq 14$  mils); (3) Shoes plus socks.

### PRODUCT INFORMATION

A103.02 is a broad-spectrum insecticide-miticide for use on greenhouse grown fruiting vegetables and greenhouse grown ornamentals. It has excellent stomach activity when ingested and good contact activity when pests come in contact with it. A103.02 is classified in a class of insecticides-miticides called Pyrroles. Members of this class of products have a similar mode of action that involves uncoupling oxidative phosphorylation and preventing conversion of ADP to ATP which affects energy metabolism so that mites

and insects cannot generate enough energy to survive.

A103.02 does not have ovicidal activity. Therefore, it should be used in combination with a registered miticide or insecticide with ovicidal activity if moderate to heavy numbers of mite or insect eggs are present at application time.

**Resistance Management:** All crop protection chemicals should be used in resistance pest management programs suitable for the crop-pest complex involved. The program should involve different classes of chemistry in the control of the pests. For more information on insect resistance, contact the local Cooperative Extension Service for suggestions on minimizing insect resistance.

When using A103.02 in greenhouses, **do not** apply more than two (2) consecutive applications before rotating to an insecticide-miticide with a different mode of action. In addition, **do not** apply A103.02 to consecutive crops in the commercial greenhouse unless applied in combination with another insecticide-miticide with a different mode of action.

**Mixing Instructions:** Agitate or shake A103.02 containers prior to use in order to prepare a uniform spray solution. Add  $\frac{1}{2}$  to  $\frac{3}{4}$  of the required amount of clean water to the spray tank and start agitation. Measure the required amount of A103.02 with a calibrated measuring device and add to the spray tank while agitating. Add the rest of the water and continue with agitation. If preparing a tank-mixture, add A103.02 to the tank first and be sure that it is fully dispersed in water before adding the additional materials. To prevent waste and disposal of used spray solution, it is best to prepare no more spray solution than is needed for the immediate operation.

**Compatibility:** Although A103.02 is compatible with many spray products, a full range of compatibilities under all local conditions has not been evaluated. Therefore, the compatibility of any mixture with A103.02 must be determined using a jar test. Conduct a jar test by adding proportionate amounts of each ingredient of the tank-mixture to a pint or quart jar. Cap, shake, and let sit for at least 15 minutes. If a precipitate forms and it cannot be readily re-dispersed, do not use the mixture because it is incompatible.

**Tank Mixing:** As stated above, if using A103.02 in a tank-mixture, always add A103.02 to the spray tank first and make sure it is fully dispersed in water before adding any other tank-mix product. Follow all applicable directions, restrictions and precautions on the label for the tank mix partners. The most restrictive labeling applies when using a tank mix. **Do not** tank mix with products that contain a label prohibition against tank mixing. **It is unlawful to tank mix A103.02 if the tank mix will be used outdoors.**

#### **FRUITING VEGETABLE CROPS GROWN IN COMMERCIAL GREENHOUSES**

A103.02 is broad-spectrum and can be used to control insect and mite pests on greenhouse grown fruiting vegetables such as eggplant, groundcherry, pepino, pepper, tomatillo and tomato. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage. A103.02 can be applied up to and including the day of harvest.

#### **Use Restrictions for Fruiting Vegetables Grown in Commercial Greenhouses**

- Apply A103.02 according to the product guidelines and restrictions stated in the "USE RESTRICTIONS" and "Resistance Management" sections of this label.
- **Do not** apply A103.02 as an ultra low volume (ULV) spray.
- **Do not** use on tomato varieties with a mature fruit diameter of less than one (1) inch.
- Allow at least 5 to 7 days between applications.
- **Do not** apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle in fruiting vegetables grown in commercial greenhouses.
- It is unlawful to use a tank-mixture with A103.02 outdoors.

**A103.02 Application Rates and Comments**  
**Fruiting Vegetables Grown In Commercial Greenhouses**

**Eggplant, Ground cherry, Pepinos, Peppers, Tomatillo and Tomato**

Target Pests	Rate (fl ozs/A)	Rate (lbs ai/A)	Comments
<b>Worms:</b> Alfalfa looper ( <i>Autographa californica</i> ) Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Fall armyworm ( <i>S. frugiperda</i> ) Hornworms ( <i>Manduca quinquemaculata</i> ) Southern armyworm ( <i>S. eridania</i> ) Tobacco budworm ( <i>H. virescens</i> ) Tomato fruitworm ( <i>Heliothis zea</i> ) Tomato pinworm ( <i>Keiferia lycopersicella</i> ) Yellowstriped armyworm ( <i>S. omithogalli</i> )	6.5 to 13	0.10 to 0.20	Apply as required by scouting. Apply in a spray volume between 5 and 100 gallons per acre.  Repeat applications as needed (usually 5 to 10 days) for control, but allow at least 5-7 days between applications. Use a longer time interval when infestations are light to moderate; shorten the time interval for heavier infestations.
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.	6.5 to 13	0.10 to 0.20	Use lower rates when populations are at action thresholds and higher rates when populations are heavy and causing damage.
<b>Thrips:</b> Melon thrips ( <i>Thrips palmi</i> ) Onion thrips ( <i>Thrips tabaci</i> ) Western flower thrips ( <i>Frankliniella occidentalis</i> )	9.8 to 13	0.15 to 0.20	

**ORNAMENTAL CROPS GROWN IN COMMERCIAL GREENHOUSES**

On greenhouse ornamentals, A103.02 is broad-spectrum and controls mites, insects and foliar nematodes. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage.

**Use Restrictions for Ornamental Crops Grown in Commercial Greenhouses**

- Apply A103.02 according to the product guidelines and restrictions stated in the "USE RESTRICTIONS" and "Resistance Management" sections of this label.
- Do not apply more than 41 fl ozs of A103.02 per 100 gallons per crop per season or 0.64 lb of active ingredient per 100 gallons per crop per season in ornamentals grown in commercial greenhouses (start to finish for one ornamental crop).
- It is unlawful to use a tank-mixture with A103.02 outdoors.

**Crop Tolerance:** Although A103.02 has been shown to be safe to many ornamental species when used according to label use directions, not all ornamental plant species and cultivars have been tested for tolerance to A103.02, tank-mix combinations of A103.02, or pesticide treatments before or after those of A103.02. Also, since local conditions can influence plant tolerance, they may not match the conditions under which testing of A103.02 was conducted.

**Sensitive Ornamental Plant Species:** Some ornamental plant species have been found, under certain conditions, to be less tolerant to A103.02 when used according to label directions. Phytotoxicity is likely to occur if A103.02 is applied to the following ornamental plant species: Dianthus (*Dianthus* spp.) including

carnations, pinks and Sweet William varieties, Kalanchoe (*Kalanchoe blossfeldiana*), Poinsettia (*Euphorbia pulcherrima*), Roses (*Rosa* spp.), Salvia (*Salvia* spp.) and Zinnia (*Zinnia* spp.).

If application is made to these sensitive ornamental plant species it is made at grower risk.

Follow these suggestions to reduce potential injury to ornamentals: (1) Do not apply to plugs in their early stages of development (1 to 2 leaf) as injury to some tender crops could occur. If application to plugs is necessary, test A103.02 on a small number of plants before doing large scale treatments. (2) Apply A103.02 during the coolest parts of the day and always apply prior to blooming or avoid applications to blooms where possible. (3) Prior to application, evaluate for potential phytotoxicity of all tank mixes with additives or other pesticide products. Additives, including spray adjuvants, are not necessary for use with A103.02. Crop oils, surfactants and fertilizer adjuvants have been shown to increase the likelihood of phytotoxicity and are not recommended with A103.02. If greenhouses are under high temperature conditions, use caution whenever including an additive with A103.02 because the injury potential is higher. Do not tank mix with products that contain a label prohibition against tank mixing. Apply the tank mix to a small area (8 to 12 plants) and evaluate for 3 to 5 days before attempting a large-scale spray to make certain that no phytotoxicity occurs.

#### A103.02 Application Rates and Comments Greenhouse Grown Ornamentals

Target Pests	Rate (fl ozs/ 100 gals)	Rate (lbs ai/100 gals)	Comments
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Citrus budmite ( <i>Eriophyes sheldoni</i> ) Cyclamen mite ( <i>Phytonemus pallidus</i> ) Rust mite ( <i>Phyllocoptura</i> spp., <i>Epitrimerus</i> spp. and <i>Aculus</i> spp.) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.)	2.6 to 5.2	0.04 to 0.08	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when mites first appear, before crop damage occurs.  Use A103.02 at 2.6 to 5.2 fl oz/100 gallons for 14 to 21 day control of low to moderate populations of mites.  Against high mite populations, or a generally high infestation across multiple crops in the same greenhouse, apply A103.02 at 5.2 fl ozs/100 gallons. Make a sequential application at 5 to 7 days after the first application to maintain control. Make only one sequential application.  A103.02 is not systemic and does not translocate throughout the plant, but it is translaminar and moves rapidly from the top to the underside of a leaf to control mites.  A103.02 will be diluted in rapidly expanding, new foliage as compared to the concentration in the leaf surface at the time of application. The sequential application mentioned above is important to maintain control.



**A103.02 Application Rates and Comments  
Greenhouse Grown Ornamentals**

<b>Target Pests</b>	<b>Rate (fl ozs/ 100 gals)</b>	<b>Rate (lbs ai/100 gals)</b>	<b>Comments</b>
<b>Worms:</b> Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Soybean looper ( <i>Psuedoplusia includes</i> )	2.6 to 6.4	0.04 to 0.10	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when worms first appear, before crop damage occurs.
Foliar nematodes ( <i>Aphelenchoides</i> spp.)	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage.  Apply an initial application at 5.2 fl ozs /100 gallons when first signs of plant damage or nematodes are observed, followed by a second application at 5.2 fl ozs/100 gallons 7 to 14 days later.  A third application at 5.2 fl ozs/100 gallons can be made at 4 to 6 weeks after the initial application if plant damage or nematodes are detected.  To improve nematode control, add an IGR (insect growth regulator) or second MOA (Mode of Action) product registered for this use as a tank mixture.
Fungus gnats ( <i>Bradysis</i> spp.)	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when fungus gnats are in the early larval stage.  A103.02 will not control emerged adults, therefore, add an IGR or second MOA product registered for this use as a tank mixture.
<b>Thrips:</b> Chilli thrips ( <i>Scirtothrips dorsalis</i> Hood) Western flower thrips ( <i>Frankliniella occidentalis</i> )	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage.  Apply when thrips are immature and when populations are building, before crop damage occurs.  Western flower thrips are difficult to control because they may be concealed in blooms. Combinations with other effective insecticides will enhance overall control.  Alternation with other MOA products such as <b>Overture® 35 WP insecticide</b> or <b>Mesuro® 75-W</b> can help prevent resistance development. Incorporate an IGR such as <b>Pedestal® novaluron insecticide</b> in your spray program.

### STORAGE AND DISPOSAL

**Do not** contaminate water, food or feed by storage or disposal.

#### **Pesticide Storage**

Keep A103.02 in its tightly closed original container, when not in use. **Do not** store below 32° F. **Do not** store in direct sunlight. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

#### **Pesticide Disposal**

Wastes resulting from the use of A103.02 may be disposed of on-site or at an approved waste disposal facility.

#### **Container Disposal**

**Nonrefillable Container:** **Do not reuse or refill this container.** Triple rinse or pressure rinse container (or equivalent) promptly after emptying (see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons) as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and contain the spill with inert material (sand, earth, etc.) and transfer liquid and solid diking material to separate containers for disposal. Keep the spill out of all sewers and open bodies of water.

### LIMITATION OF WARRANTY AND LIABILITY

**IMPORTANT: READ BEFORE USE.** Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of ATTICUS, LLC. All such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** To the extent consistent with applicable law, ATTICUS, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

**LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, neither ATTICUS, LLC the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent

with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

MesuroI is a registered trademark of Bayer AG, Germany

Overture is a registered trademark of Valent U.S.A. Corporation

Pedestal is a registered trademark of Makhteshim Agan of North America.

A103.02 is not manufactured or distributed by BASF Corporation, seller of Pylon®.

Pylon® is a registered trademark of BASF Corporation.

{LANGUAGE ON LABEL AFFIXED TO  
CONTAINER}

**A103.02**

For Use Only On Fruiting Vegetables and Ornamental Crops Grown  
in Commercial Greenhouses

**Active Ingredient:**

(% by weight)

Chlorfenapyr\* ..... 21.4%  
Other Ingredients ..... 78.6%  
Total ..... 100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-  
pyrrole-3-carbonitrile  
Contains 2.0 pounds of chlorfenapyr per gallon.  
Contains chlorfenapyr, the active ingredient used in Pylon®.

See label booklet for First Aid, additional Precautionary Statements and  
Directions for Use.

[Note to reviewer: The label booklet shall be securely attached to the  
immediate container]

**Manufactured For:**

Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

**EPA Reg. No.: 91234-XX**

**EPA Est. No.:**

**Net Contents:**

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

Si usted no entiende la etiqueta, busque a alguien para que se la  
explique a usted en detalle. (If you do not understand the label, find  
someone to explain it to you in detail.)

**Precautionary Statements**

**Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin.  
Causes moderate eye irritation. Avoid breathing vapors or spray mist.  
Avoid contact with skin, eyes or clothing. Wash hands thoroughly with  
soap and water after handling and before eating, drinking, chewing gum,  
using tobacco, or using the toilet. Remove and wash contaminated  
clothing before reuse.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage**

Keep A103.02 in its tightly closed original container, when not in use. Do  
not store below 32° F. Do not store in direct sunlight. Store in a cool, dry  
(preferably locked) area that is inaccessible to children and animals.

**Pesticide Disposal**

Wastes resulting from the use of A103.02 may be disposed of on-site or  
at an approved waste disposal facility.

**Container Disposal**

**Nonrefillable Container:** Do not reuse or refill this container. Triple  
rinse or pressure rinse container (or equivalent) promptly after emptying  
(see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons)  
as follows:** Empty the remaining contents into application equipment or a  
mix tank and drain for 10 seconds after the flow begins to drip. Fill the  
container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate  
into application equipment or a mix tank, or store rinsate for later use or  
disposal. Drain for 10 seconds after the flow begins to drip. Repeat this  
procedure two more times. Offer for recycling if available for  
reconditioning if appropriate, or puncture and dispose of in a sanitary  
landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into  
application equipment or mix tank and continue to drain for 10 seconds  
after the flow begins to drip. Hold container upside down over application  
equipment or mix tank, or collect rinsate for later use or disposal. Insert  
pressure rinsing nozzle in the side of the container and rinse at about 40  
PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to  
drip. Offer for recycling if available for reconditioning if appropriate, or  
puncture and dispose of in a sanitary landfill, or by other procedures  
approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and  
contain the spill with inert material (sand, earth, etc.) and transfer liquid  
and solid diking material to separate containers for disposal. Keep the  
spill out of all sewers and open bodies of water.

Decision Seq: 518428

Action Code: R301, NEW PRODUCT; IDENTICAL OR SUBSTANTIALLY SIMILA

FFS Start Date: 07-Jul-2016

Tentative Ind: No

Start/Stop Clock

FQPA Clock:

Due Date: 07-Nov-2016

75-Day Due Date:

Days Elapsed:

OPP Target Due Date:

21-Day Due Date: 07-Jul-2016

FFS Original Decision:

Negotiated Due Date:

45-Day Due Date: 22-Aug-2016

Registrant

Predecisional

Due Date: 24-Oct-2016

Add to Bundle?

Response Due Date:

Due Date:

Current Status: CLOSED (07-Nov-2016)

Bundle ID:

Decision Status

Tracking

Create Resubmission

FFS Letters

Waiver Documentation

Action Code History

Secondary Decision

Decision Bundle

75 Day Letters

45/90 Day Screen

Primary Decisions

Decision Milestone

FFS Negotiated Due Dates

OPP Target Due Date

Decision Comments

Payment

Unmatched Payments

Decision Ownership

Receipts

Data Package

Reduced Risk

Meetings &amp; Milestones

FFS Information

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
S:994579	Rodia, Carmen	91234-19	07-Nov-2016	OBJECTION - LABEL DEFICIENCY
Resubmitted for updated label.				
S:994581	Rodia, Carmen	91234-19	07-Nov-2016	3(c)(7)(A) Conditional Registration
Submission of final updated master label.				
S:987841	Rodia, Carmen	91234-19	07-Nov-2016	OBJECTION - LABEL DEFICIENCY
Initial application for registration of new chlorfenapyr product.				

Viewing Record 1 of 1

## Rodia, Carmen

---

**From:** Nicole O'Loughlin <Nicole@PyxisRC.com>  
**Sent:** Monday, November 07, 2016 12:19 PM  
**To:** Rodia, Carmen  
**Cc:** McCall, Deborah; Gebken, Richard; Walsh, Michael  
**Subject:** RE: Secondary Label Review Comments for EPA File Symbol 91234-RO (A103.02)  
**Attachments:** 091234-xxxxx.20161107 A103.02 Label\_clean.pdf; 091234-xxxxx.20161107 A103.02 Label\_tracked.pdf

Carmen,

I have added the additional language to the PPE section of the label. Please see the attached and let me know if you need anything else.

Regards,  
Nicole

**Nicole O'Loughlin**  
**Pyxis Regulatory Consulting, Inc.**  
4110 136th St. Ct. NW  
Gig Harbor, WA 98332  
(T): (253) 853-7369  
(F): (253) 853-5516  
(E): [Nicole@PyxisRC.com](mailto:Nicole@PyxisRC.com)

---

**From:** Rodia, Carmen [<mailto:Rodia.Carmen@epa.gov>]  
**Sent:** Monday, November 07, 2016 8:12 AM  
**To:** Nicole O'Loughlin <Nicole@PyxisRC.com>  
**Cc:** McCall, Deborah <McCall.Deborah@epa.gov>; Gebken, Richard <Gebken.Richard@epa.gov>; Walsh, Michael <Walsh.Michael@epa.gov>  
**Subject:** Secondary Label Review Comments for EPA File Symbol 91234-RO (A103.02)

Nicole, in anticipation of stamping a "clean label" with no comments later today in support of the R301 pending new product registration for EPA File Symbol 91234-RO (A103.02), I have incorporated a few remaining secondary label review comments within the PPE section that will need to be worked into a further updated master label. The referenced secondary label review comments are related to required mitigation listed in the interim decision document supporting the registration review for chlorfenapyr.

**PLEASE NOTE: The PRIA conclusion date for this R301 pending new product registration is today, Monday, November 7, 2016, and I will need you to submit the further updated master label as soon as possible so that we can meet your PRIA date for this new product.**

If you have any questions, please contact me directly. Once the master label has been further updated, please e-mail it to me for use in completing the new product registration later TODAY. Regards, Carmen Rodia.

*Carmen J. Rodia, Jr.*

Carmen J. Rodia, Jr.  
Environmental Protection Specialist  
U.S. EPA, Office of Pesticide Programs,  
Registration Division, Invertebrate & Vertebrate Branch 2  
1200 Pennsylvania Avenue, NW (7504P)  
Washington, DC 20460-0001  
(703) 306-0327 (tel)

(703) 308-0029 (fax)  
Rodia.Carmen@epa.gov

[Note to reviewer: {Text} in brackets denotes optional text.]

[Note to reviewer: {Text} in braces denotes where in the final label text will appear.]

## {BOOKLET FRONT PANEL LANGUAGE}

GROUP

13

INSECTICIDE

# A103.02

For Use Only On Fruiting Vegetables and Ornamental Crops Grown in Commercial Greenhouses

Active Ingredient:	(% by weight)
Chlorfenapyr* .....	21.4%
Other Ingredients .....	78.6%
Total .....	100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile

Contains 2.0 pounds of chlorfenapyr per gallon.

Contains chlorfenapyr, the active ingredient used in Pylon®.

## KEEP OUT OF REACH OF CHILDREN CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See inside label booklet for First Aid, Precautionary Statements and Directions for Use.

Manufactured For:  
Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

EPA Reg. No.: 91234-XX  
EPA Est. No.:

Net Contents:



## { LANGUAGE INSIDE BOOKLET }

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
IF ON SKIN	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
IF INHALED	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance; then give artificial respiration, preferably by mouth to mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
IF IN EYES	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>HOT LINE NUMBERS</b> <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), you may call SafetyCall® at <b>1-844-685-9173</b>, 24 hours per day, 7 days per week. For chemical emergency: spill, leak, fire, exposure or accident, you may call CHEMTREC: <b>1-800-424-9300</b>.</p>	

**For Chemical Emergency**  
**Spill, Leak, Fire, Exposure, or Accident**  
**Call CHEMTREC Day or Night**  
**Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)**

### Precautionary Statements

#### Hazards to Humans and Domestic Animals

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin. Causes moderate eye irritation. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

#### Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below.

**Applicators and Other Handlers Must Wear:** (1) long-sleeved shirt and long pants; (2) chemical-resistant gloves, such as Barrier Laminate ( $\geq 14$  mils), Butyl Rubber ( $\geq 14$  mils), Nitrile Rubber ( $\geq 14$  mils), Neoprene Rubber ( $\geq 14$  mils), Polyvinyl Chloride (PVC), or Viton ( $\geq 14$  mils); (3) shoes plus socks.

**In Addition, All Mixers/Loaders/Applicators of Liquids Using a Mechanically-Pressurized Handgun for Application to Fruiting Vegetables Grown in Commercial Greenhouses Must Wear:**

(1) long-sleeved shirt and long pants; (2) chemical-resistant gloves, such as Barrier Laminate ( $> 14$  mils), Butyl Rubber ( $> 14$  mils), Nitrile Rubber ( $> 14$  mils), Neoprene Rubber ( $> 14$  mils), Polyvinyl Chloride (PVC), or Viton ( $\geq 14$  mils); (3) PF 5 respirator; and (4) shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with the product's concentrate. **Do not** reuse them.

#### Engineering Controls Statement

When handlers use closed systems or enclosed cabs in a manner that meets the requirements of the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240 (d) (4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

**IMPORTANT:** When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for **applicators and other handlers**, and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown.

#### USER SAFETY RECOMMENDATIONS

**Users should:** (1) Wash hands thoroughly before eating, drinking, chewing gum, using tobacco, or using the toilet. (2) Remove contaminated clothing/PPE immediately and then wash thoroughly and change into clean clothing. (3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### Environmental Hazards

This pesticide is toxic to aquatic organisms, birds, and wildlife.

This product is toxic to bees exposed to direct treatment on blooming crops or weeds. **Do not** apply this product or allow it to drift to blooming crops or weeds if bees are actively foraging in the treatment area.

**Do not** contaminate water by cleaning of equipment or when disposing of equipment washwaters or rinsate. **Do not** discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or regional office of the EPA. **Do not** discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge.

### Physical or Chemical Hazards

**Do not** apply this product around electrical equipment due to the possibility of shock hazard. **Do not** mix or allow this product to come into contact with an oxidizing agent. Hazardous chemical reaction may occur.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation

### USE RESTRICTIONS

- **Do not** apply A103.02 except as specified on this label.
- **Do not** apply A103.02 in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application.
- **Do not** use A103.02 on any other crops except fruiting vegetable crops and ornamental crops grown in commercial greenhouses.
- **Do not** contaminate food or feedstuffs.
- **Do not** compost any discarded plant materials that have been treated with A103.02.
- **Do not** apply A103.02 through any type of irrigation system.
- **Do not** tank mix with products that contain a label prohibition against tank mixing.
- **Do not** apply more than three (3) applications of A103.02 during a crop growing cycle.
- **Do not** use A103.02 to formulate, reformulate or repackage into any other pesticide product without the written permission of Atticus, LLC.
- **Do not** apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle in fruiting vegetables.
- It is unlawful to use A103.02 on anything other than ornamental crops or fruiting vegetable crops in commercial greenhouses.

### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard (WPS), 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval.

**Do not** enter or allow worker entry into treated areas during the restricted entry interval (REI) of **12 hours**.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: (1) Coveralls; (2) Chemical-resistant gloves, such as Barrier Laminate ( $\geq 14$  mils), Butyl Rubber ( $\geq 14$  mils), Nitrile Rubber ( $\geq 14$  mils), Neoprene Rubber ( $\geq 14$  mils), Polyvinyl Chloride (PVC) or Viton ( $\geq 14$  mils); (3) Shoes plus socks.

### PRODUCT INFORMATION

A103.02 is a broad-spectrum insecticide-miticide for use on greenhouse grown fruiting vegetables and greenhouse grown ornamentals. It has excellent stomach activity when ingested and good contact activity when pests come in contact with it. A103.02 is classified in a class of insecticides-miticides called Pyrroles. Members of this class of products have a similar mode of action that involves uncoupling oxidative phosphorylation and preventing conversion of ADP to ATP which affects energy metabolism so that mites

and insects cannot generate enough energy to survive.

A103.02 does not have ovicidal activity. Therefore, it should be used in combination with a registered miticide or insecticide with ovicidal activity if moderate to heavy numbers of mite or insect eggs are present at application time.

**Resistance Management:** All crop protection chemicals should be used in resistance pest management programs suitable for the crop-pest complex involved. The program should involve different classes of chemistry in the control of the pests. For more information on insect resistance, contact the local Cooperative Extension Service for suggestions on minimizing insect resistance.

When using A103.02 in greenhouses, **do not** apply more than two (2) consecutive applications before rotating to an insecticide-miticide with a different mode of action. In addition, **do not** apply A103.02 to consecutive crops in the commercial greenhouse unless applied in combination with another insecticide-miticide with a different mode of action.

**Mixing Instructions:** Agitate or shake A103.02 containers prior to use in order to prepare a uniform spray solution. Add  $\frac{1}{2}$  to  $\frac{3}{4}$  of the required amount of clean water to the spray tank and start agitation. Measure the required amount of A103.02 with a calibrated measuring device and add to the spray tank while agitating. Add the rest of the water and continue with agitation. If preparing a tank-mixture, add A103.02 to the tank first and be sure that it is fully dispersed in water before adding the additional materials. To prevent waste and disposal of used spray solution, it is best to prepare no more spray solution than is needed for the immediate operation.

**Compatibility:** Although A103.02 is compatible with many spray products, a full range of compatibilities under all local conditions has not been evaluated. Therefore, the compatibility of any mixture with A103.02 must be determined using a jar test. Conduct a jar test by adding proportionate amounts of each ingredient of the tank-mixture to a pint or quart jar. Cap, shake, and let sit for at least 15 minutes. If a precipitate forms and it cannot be readily re-dispersed, do not use the mixture because it is incompatible.

**Tank Mixing:** As stated above, if using A103.02 in a tank-mixture, always add A103.02 to the spray tank first and make sure it is fully dispersed in water before adding any other tank-mix product. Follow all applicable directions, restrictions and precautions on the label for the tank mix partners. The most restrictive labeling applies when using a tank mix. **Do not** tank mix with products that contain a label prohibition against tank mixing. **It is unlawful to tank mix A103.02 if the tank mix will be used outdoors.**

#### **FRUITING VEGETABLE CROPS GROWN IN COMMERCIAL GREENHOUSES**

A103.02 is broad-spectrum and can be used to control insect and mite pests on greenhouse grown fruiting vegetables such as eggplant, groundcherry, pepino, pepper, tomatillo and tomato. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage. A103.02 can be applied up to and including the day of harvest.

#### **Use Restrictions for Fruiting Vegetables Grown in Commercial Greenhouses**

- Apply A103.02 according to the product guidelines and restrictions stated in the "USE RESTRICTIONS" and "Resistance Management" sections of this label.
- **Do not** apply A103.02 as an ultra low volume (ULV) spray.
- Do not use on tomato varieties with a mature fruit diameter of less than one (1) inch.
- Allow at least 5 to 7 days between applications.
- **Do not** apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle in fruiting vegetables grown in commercial greenhouses.
- It is unlawful to use a tank-mixture with A103.02 outdoors.

**A103.02 Application Rates and Comments  
Fruiting Vegetables Grown In Commercial Greenhouses**

**Eggplant, Ground cherry, Pepinos, Peppers, Tomatillo and Tomato**

Target Pests	Rate (fl ozs/A)	Rate (lbs ai/A)	Comments
<b>Worms:</b> Alfalfa looper ( <i>Autographa californica</i> ) Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Fall armyworm ( <i>S. frugiperda</i> ) Hornworms ( <i>Manduca quinquemaculata</i> ) Southern armyworm ( <i>S. eridania</i> ) Tobacco budworm ( <i>H. virescens</i> ) Tomato fruitworm ( <i>Heliothis zea</i> ) Tomato pinworm ( <i>Keiferia lycopersicella</i> ) Yellowstriped armyworm ( <i>S. ornithogalli</i> )	6.5 to 13	0.10 to 0.20	Apply as required by scouting. Apply in a spray volume between 5 and 100 gallons per acre.  Repeat applications as needed (usually 5 to 10 days) for control, but allow at least 5-7 days between applications. Use a longer time interval when infestations are light to moderate; shorten the time interval for heavier infestations.
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.	6.5 to 13	0.10 to 0.20	Use lower rates when populations are at action thresholds and higher rates when populations are heavy and causing damage.
<b>Thrips:</b> Melon thrips ( <i>Thrips palmi</i> ) Onion thrips ( <i>Thrips tabaci</i> ) Western flower thrips ( <i>Frankliniella occidentalis</i> )	9.8 to 13	0.15 to 0.20	

**ORNAMENTAL CROPS GROWN IN COMMERCIAL GREENHOUSES**

On greenhouse ornamentals, A103.02 is broad-spectrum and controls mites, insects and foliar nematodes. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage.

**Use Restrictions for Ornamental Crops Grown in Commercial Greenhouses**

- Apply A103.02 according to the product guidelines and restrictions stated in the "USE RESTRICTIONS" and "Resistance Management" sections of this label.
- Do not apply more than 41 fl ozs of A103.02 per 100 gallons per crop per season or 0.64 lb of active ingredient per 100 gallons per crop per season in ornamentals grown in commercial greenhouses (start to finish for one ornamental crop).
- It is unlawful to use a tank-mixture with A103.02 outdoors.

**Crop Tolerance:** Although A103.02 has been shown to be safe to many ornamental species when used according to label use directions, not all ornamental plant species and cultivars have been tested for tolerance to A103.02, tank-mix combinations of A103.02, or pesticide treatments before or after those of A103.02. Also, since local conditions can influence plant tolerance, they may not match the conditions under which testing of A103.02 was conducted.

**Sensitive Ornamental Plant Species:** Some ornamental plant species have been found, under certain conditions, to be less tolerant to A103.02 when used according to label directions. Phytotoxicity is likely to occur if A103.02 is applied to the following ornamental plant species: Dianthus (*Dianthus* spp.) including

carnations, pinks and Sweet William varieties, Kalanchoe (*Kalanchoe blossfeldiana*), Poinsettia (*Euphorbia pulcherrima*), Roses (*Rosa* spp.), Salvia (*Salvia* spp.) and Zinnia (*Zinnia* spp.).

**If application is made to these sensitive ornamental plant species it is made at grower risk.**

**Follow these suggestions to reduce potential injury to ornamentals:** (1) Do not apply to plugs in their early stages of development (1 to 2 leaf) as injury to some tender crops could occur. If application to plugs is necessary, test A103.02 on a small number of plants before doing large scale treatments. (2) Apply A103.02 during the coolest parts of the day and always apply prior to blooming or avoid applications to blooms where possible. (3) Prior to application, evaluate for potential phytotoxicity of all tank mixes with additives or other pesticide products. Additives, including spray adjuvants, are not necessary for use with A103.02. Crop oils, surfactants and fertilizer adjuvants have been shown to increase the likelihood of phytotoxicity and are not recommended with A103.02. If greenhouses are under high temperature conditions, use caution whenever including an additive with A103.02 because the injury potential is higher. Do not tank mix with products that contain a label prohibition against tank mixing. Apply the tank mix to a small area (8 to 12 plants) and evaluate for 3 to 5 days before attempting a large-scale spray to make certain that no phytotoxicity occurs.

#### A103.02 Application Rates and Comments Greenhouse Grown Ornamentals

Target Pests	Rate (fl ozs/ 100 gals)	Rate (lbs ai/100 gals)	Comments
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Citrus budmite ( <i>Eriophyes sheldoni</i> ) Cyclamen mite ( <i>Phytonemus pallidus</i> ) Rust mite ( <i>Phyllocoptruta</i> spp., <i>Epitrimerus</i> spp. and <i>Aculus</i> spp.) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.)	2.6 to 5.2	0.04 to 0.08	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when mites first appear, before crop damage occurs.  Use A103.02 at 2.6 to 5.2 fl oz/100 gallons for 14 to 21 day control of low to moderate populations of mites.  Against high mite populations, or a generally high infestation across multiple crops in the same greenhouse, apply A103.02 at 5.2 fl ozs/100 gallons. Make a sequential application at 5 to 7 days after the first application to maintain control. Make only one sequential application.  A103.02 is not systemic and does not translocate throughout the plant, but it is translaminar and moves rapidly from the top to the underside of a leaf to control mites.  A103.02 will be diluted in rapidly expanding, new foliage as compared to the concentration in the leaf surface at the time of application. The sequential application mentioned above is important to maintain control.

**A103.02 Application Rates and Comments  
Greenhouse Grown Ornamentals**

<b>Target Pests</b>	<b>Rate (fl ozs/ 100 gals)</b>	<b>Rate (lbs ai/100 gals)</b>	<b>Comments</b>
<b>Worms:</b> Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Soybean looper ( <i>Psuedoplusia includes</i> )	2.6 to 6.4	0.04 to 0.10	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when worms first appear, before crop damage occurs.
Foliar nematodes ( <i>Aphelenchoides</i> spp.)	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage.  Apply an initial application at 5.2 fl ozs /100 gallons when first signs of plant damage or nematodes are observed, followed by a second application at 5.2 fl ozs/100 gallons 7 to 14 days later.  A third application at 5.2 fl ozs/100 gallons can be made at 4 to 6 weeks after the initial application if plant damage or nematodes are detected.  To improve nematode control, add an IGR (insect growth regulator) or second MOA (Mode of Action) product registered for this use as a tank mixture.
Fungus gnats ( <i>Bradysia</i> spp.)	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when fungus gnats are in the early larval stage.  A103.02 will not control emerged adults, therefore, add an IGR or second MOA product registered for this use as a tank mixture.
<b>Thrips:</b> Chilli thrips ( <i>Scirtothrips dorsalis</i> Hood) Western flower thrips ( <i>Frankliniella occidentalis</i> )	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage.  Apply when thrips are immature and when populations are building, before crop damage occurs.  Western flower thrips are difficult to control because they may be concealed in blooms. Combinations with other effective insecticides will enhance overall control.  Alternation with other MOA products such as <b>Overture® 35 WP insecticide</b> or <b>Mesuro® 75-W</b> can help prevent resistance development. Incorporate an IGR such as <b>Pedestal® novaluron insecticide</b> in your spray program.

### STORAGE AND DISPOSAL

**Do not** contaminate water, food or feed by storage or disposal.

#### **Pesticide Storage**

Keep A103.02 in its tightly closed original container, when not in use. **Do not** store below 32° F. **Do not** store in direct sunlight. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

#### **Pesticide Disposal**

Wastes resulting from the use of A103.02 may be disposed of on-site or at an approved waste disposal facility.

#### **Container Disposal**

**Nonrefillable Container:** **Do not reuse or refill this container.** Triple rinse or pressure rinse container (or equivalent) promptly after emptying (see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons) as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and contain the spill with inert material (sand, earth, etc.) and transfer liquid and solid diking material to separate containers for disposal. Keep the spill out of all sewers and open bodies of water.

### LIMITATION OF WARRANTY AND LIABILITY

**IMPORTANT: READ BEFORE USE.** Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of ATTICUS, LLC. All such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** To the extent consistent with applicable law, ATTICUS, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

**LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, neither ATTICUS, LLC the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent



with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

Mesuroi is a registered trademark of Bayer AG, Germany

Overture is a registered trademark of Valent U.S.A. Corporation

Pedestal is a registered trademark of Makhteshim Agan of North America.

A103.02 is not manufactured or distributed by BASF Corporation, seller of Pylon®.

Pylon® is a registered trademark of BASF Corporation.

**{LANGUAGE ON LABEL AFFIXED TO  
CONTAINER}**

**A103.02**

**For Use Only On Fruiting Vegetables and Ornamental Crops Grown  
in Commercial Greenhouses**

**Active Ingredient:**

(% by weight)

Chlorfenapyr\*: ..... 21.4%  
Other Ingredients ..... 78.6%  
Total ..... 100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-  
pyrrole-3-carbonitrile

Contains 2.0 pounds of chlorfenapyr per gallon.

Contains chlorfenapyr, the active ingredient used in Pylon®.

See label booklet for First Aid, additional Precautionary Statements and  
Directions for Use.

*[Note to reviewer: The label booklet shall be securely attached to the  
immediate container]*

**Manufactured For:**

Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

**EPA Reg. No.: 91234-XX**

**EPA Est. No.:**

**Net Contents:**

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

Si usted no entiende la etiqueta, busque a alguien para que se la  
explique a usted en detalle. (If you do not understand the label, find  
someone to explain it to you in detail.)

**Precautionary Statements**

**Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin.  
Causes moderate eye irritation. Avoid breathing vapors or spray mist.  
Avoid contact with skin, eyes or clothing. Wash hands thoroughly with  
soap and water after handling and before eating, drinking, chewing gum,  
using tobacco, or using the toilet. Remove and wash contaminated  
clothing before reuse.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage**

Keep A103.02 in its tightly closed original container, when not in use. Do  
not store below 32° F. Do not store in direct sunlight. Store in a cool, dry  
(preferably locked) area that is inaccessible to children and animals.

**Pesticide Disposal**

Wastes resulting from the use of A103.02 may be disposed of on-site or  
at an approved waste disposal facility.

**Container Disposal**

**Nonrefillable Container:** Do not reuse or refill this container. Triple  
rinse or pressure rinse container (or equivalent) promptly after emptying  
(see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons)  
as follows:** Empty the remaining contents into application equipment or a  
mix tank and drain for 10 seconds after the flow begins to drip. Fill the  
container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate  
into application equipment or a mix tank, or store rinsate for later use or  
disposal. Drain for 10 seconds after the flow begins to drip. Repeat this  
procedure two more times. Offer for recycling if available for  
reconditioning if appropriate, or puncture and dispose of in a sanitary  
landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into  
application equipment or mix tank and continue to drain for 10 seconds  
after the flow begins to drip. Hold container upside down over application  
equipment or mix tank, or collect rinsate for later use or disposal. Insert  
pressure rinsing nozzle in the side of the container and rinse at about 40  
PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to  
drip. Offer for recycling if available for reconditioning if appropriate, or  
puncture and dispose of in a sanitary landfill, or by other procedures  
approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and  
contain the spill with inert material (sand, earth, etc.) and transfer liquid  
and solid diking material to separate containers for disposal. Keep the  
spill out of all sewers and open bodies of water.

## Rodia, Carmen

---

**From:** Rodia, Carmen  
**Sent:** Monday, November 07, 2016 11:12 AM  
**To:** 'Nicole O'Loughlin'  
**Cc:** McCall, Deborah; Gebken, Richard; Walsh, Michael  
**Subject:** Secondary Label Review Comments for EPA File Symbol 91234-RO (A103.02)  
**Attachments:** 91234-19 (A103.02), Marked Up Label (11-07-16).pdf

Nicole, in anticipation of stamping a "clean label" with no comments later today in support of the R301 pending new product registration for EPA File Symbol 91234-RO (A103.02), I have incorporated a few remaining secondary label review comments within the PPE section that will need to be worked into a further updated master label. The referenced secondary label review comments are related to required mitigation listed in the interim decision document supporting the registration review for chlorfenapyr.

**PLEASE NOTE: The PRIA conclusion date for this R301 pending new product registration is today, Monday, November 7, 2016, and I will need you to submit the further updated master label as soon as possible so that we can meet your PRIA date for this new product.**

If you have any questions, please contact me directly. Once the master label has been further updated, please e-mail it to me for use in completing the new product registration later TODAY. Regards, Carmen Rodia.

*Carmen J. Rodia, Jr.*

Carmen J. Rodia, Jr.  
Environmental Protection Specialist  
U.S. EPA, Office of Pesticide Programs,  
Registration Division, Invertebrate & Vertebrate Branch 2  
1200 Pennsylvania Avenue, NW (7504P)  
Washington, DC 20460-0001  
(703) 306-0327 (tel)  
(703) 308-0029 (fax)  
[Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov)

[Note to reviewer: [Text] in brackets denotes optional text.]

[Note to reviewer: {Text} in braces denotes where in the final label text will appear.]

## {BOOKLET FRONT PANEL LANGUAGE}

GROUP

13

INSECTICIDE

# A103.02

For Use Only On Fruiting Vegetables and Ornamental Crops Grown in Commercial Greenhouses

Active Ingredient:	(% by weight)
Chlorfenapyr*:	21.4%
Other Ingredients:	78.6%
Total:	100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile

Contains 2.0 pounds of chlorfenapyr per gallon.

Contains chlorfenapyr, the active ingredient used in Pylon®.

## KEEP OUT OF REACH OF CHILDREN CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See inside label booklet for First Aid, Precautionary Statements and Directions for Use.

Manufactured For:  
Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

EPA Reg. No.: 91234-XX  
EPA Est. No.:

Net Contents:

## { LANGUAGE INSIDE BOOKLET }

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
IF ON SKIN	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
IF INHALED	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance; then give artificial respiration, preferably by mouth to mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
IF IN EYES	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>HOT LINE NUMBERS</b> <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), you may call SafetyCall® at <b>1-844-685-9173</b>, 24 hours per day, 7 days per week. For chemical emergency: spill, leak, fire, exposure or accident, you may call CHEMTREC: <b>1-800-424-9300</b>.</p>	

**For Chemical Emergency**  
**Spill, Leak, Fire, Exposure, or Accident**  
**Call CHEMTREC Day or Night**  
**Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)**

**Precautionary Statements**  
**Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin. Causes moderate eye irritation. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

**Personal Protective Equipment (PPE)**

Some materials that are chemical-resistant to this product are listed below.

**Applicators and Other Handlers Must Wear:** (1) long-sleeved shirt and long pants; (2) chemical-resistant gloves, such as Barrier Laminate ( $\geq 14$  mils), Butyl Rubber ( $\geq 14$  mils), Nitrile Rubber ( $\geq 14$  mils), Neoprene Rubber ( $\geq 14$  mils), Polyvinyl Chloride (PVC), or Viton ( $\geq 14$  mils); (3) shoes plus socks. <sup>1</sup>

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

**Engineering Controls Statement**

When handlers use closed systems or enclosed cabs in a manner that meets the requirements of the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240 (d) (4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

**IMPORTANT:** When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for **applicators and other handlers**, and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown.

**USER SAFETY RECOMMENDATIONS**

**Users should:** (1) Wash hands thoroughly before eating, drinking, chewing gum, using tobacco, or using the toilet. (2) Remove contaminated clothing/PPE immediately and then wash thoroughly and change into clean clothing. (3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**Environmental Hazards**

This pesticide is toxic to aquatic organisms, birds, and wildlife.

This product is toxic to bees exposed to direct treatment on blooming crops or weeds. **Do not** apply this product or allow it to drift to blooming crops or weeds if bees are actively foraging in the treatment area.

**Do not** contaminate water by cleaning of equipment or when disposing of equipment washwaters or rinsate. **Do not** discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or regional office of the EPA. **Do not** discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge.

**Physical or Chemical Hazards**

**Do not** apply this product around electrical equipment due to the possibility of shock hazard. **Do not** mix or allow this product to come into contact with an oxidizing agent. Hazardous chemical reaction may occur.

# Summary of Comments on US EPA, Pesticide Product Label

Page: 3

Number: 1 Author: crodia Subject: Inserted Text Date: 11/7/2016 11:02:57 AM

**Applicators and Other Handlers Must Wear:** (1) long-sleeved shirt and long pants; (2) chemical-resistant gloves, such as Barrier Laminate (> 14 mils), Butyl Rubber (> 14 mils), Nitrile Rubber (> 14 mils), Neoprene Rubber (> 14 mils), Polyvinyl Chloride (PVC) (> 14 mils), or Viton (≥ 14 mils); and (3) shoes plus socks.

**In Addition, All Mixers/Loaders/Applicators of Liquids Using a Mechanically-Pressurized Handgun for Application to Fruiting Vegetables Grown in Commercial Greenhouses Must Wear:** (1) long-sleeved shirt and long pants; (2) chemical-resistant gloves, such as Barrier Laminate (> 14 mils), Butyl Rubber (> 14 mils), Nitrile Rubber (> 14 mils), Neoprene Rubber (> 14 mils), Polyvinyl Chloride (PVC) (> 14 mils), or Viton (≥ 14 mils); (3) PF 5 respirator; and (4) shoes plus socks.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons; either directly or through drift. Only protected handlers may be in the treated area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation.

### USE RESTRICTIONS

- Do not apply A103.02 except as specified on this label.
- Do not apply A103.02 in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application.
- Do not use A103.02 on any other crops except fruiting vegetable crops and ornamental crops grown in commercial greenhouses.
- Do not contaminate food or feedstuffs.
- Do not compost any discarded plant materials that have been treated with A103.02.
- Do not apply A103.02 through any type of irrigation system.
- Do not tank mix with products that contain a label prohibition against tank mixing.
- Do not apply more than three (3) applications of A103.02 during a crop growing cycle.
- Do not use A103.02 to formulate, reformulate or repackage into any other pesticide product without the written permission of Atticus, LLC.
- Do not apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle in fruiting vegetables.
- It is unlawful to use A103.02 on anything other than ornamental crops or fruiting vegetable crops in commercial greenhouses.

### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard (WPS), 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval.

**Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.**

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: (1) Coveralls; (2) Chemical-resistant gloves, such as Barrier Laminate ( $\geq 14$  mils), Butyl Rubber ( $\geq 14$  mils), Nitrile Rubber ( $\geq 14$  mils), Neoprene Rubber ( $\geq 14$  mils), Polyvinyl Chloride (PVC) or Viton ( $\geq 14$  mils); (3) Shoes plus socks.

### PRODUCT INFORMATION

A103.02 is a broad-spectrum insecticide-miticide for use on greenhouse grown fruiting vegetables and greenhouse grown ornamentals. It has excellent stomach activity when ingested and good contact activity when pests come in contact with it. A103.02 is classified in a class of insecticides-miticides called Pyrroles. Members of this class of products have a similar mode of action that involves uncoupling oxidative phosphorylation and preventing conversion of ADP to ATP which affects energy metabolism so that mites and insects cannot generate enough energy to survive.

A103.02 does not have ovicidal activity. Therefore, it should be used in combination with a registered miticide or insecticide with ovicidal activity if moderate to heavy numbers of mite or insect eggs are present at application time.



**Resistance Management:** All crop protection chemicals should be used in resistance pest management programs suitable for the crop-pest complex involved. The program should involve different classes of chemistry in the control of the pests. For more information on insect resistance, contact the local Cooperative Extension Service for suggestions on minimizing insect resistance.

When using A103.02 in greenhouses, **do not** apply more than two (2) consecutive applications before rotating to an insecticide-miticide with a different mode of action. In addition, **do not** apply A103.02 to consecutive crops in the commercial greenhouse unless applied in combination with another insecticide-miticide with a different mode of action.

**Mixing Instructions:** Agitate or shake A103.02 containers prior to use in order to prepare a uniform spray solution. Add ½ to ¾ of the required amount of clean water to the spray tank and start agitation. Measure the required amount of A103.02 with a calibrated measuring device and add to the spray tank while agitating. Add the rest of the water and continue with agitation. If preparing a tank-mixture, add A103.02 to the tank first and be sure that it is fully dispersed in water before adding the additional materials. To prevent waste and disposal of used spray solution, it is best to prepare no more spray solution than is needed for the immediate operation.

**Compatibility:** Although A103.02 is compatible with many spray products, a full range of compatibilities under all local conditions has not been evaluated. Therefore, the compatibility of any mixture with A103.02 must be determined using a jar test. Conduct a jar test by adding proportionate amounts of each ingredient of the tank-mixture to a pint or quart jar. Cap, shake, and let sit for at least 15 minutes. If a precipitate forms and it cannot be readily re-dispersed, do not use the mixture because it is incompatible.

**Tank Mixing:** As stated above, if using A103.02 in a tank-mixture, always add A103.02 to the spray tank first and make sure it is fully dispersed in water before adding any other tank-mix product. Follow all applicable directions, restrictions and precautions on the label for the tank mix partners. The most restrictive labeling applies when using a tank mix. **Do not** tank mix with products that contain a label prohibition against tank mixing. **It is unlawful to tank mix A103.02 if the tank mix will be used outdoors.**

#### **FRUITING VEGETABLE CROPS GROWN IN COMMERCIAL GREENHOUSES**

A103.02 is broad-spectrum and can be used to control insect and mite pests on greenhouse grown fruiting vegetables such as eggplant, groundcherry, pepino, pepper, tomatillo and tomato. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage. A103.02 can be applied up to and including the day of harvest.

#### **Use Restrictions for Fruiting Vegetables Grown in Commercial Greenhouses**

- Apply A103.02 according to the product guidelines and restrictions stated in the "USE RESTRICTIONS" and "Resistance Management" sections of this label.
- **Do not** apply A103.02 as an ultra low volume (ULV) spray.
- Do not use on tomato varieties with a mature fruit diameter of less than one (1) inch.
- Allow at least 5 to 7 days between applications.
- **Do not** apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle in fruiting vegetables grown in commercial greenhouses.
- It is unlawful to use a tank-mixture with A103.02 outdoors.

**A103.02 Application Rates and Comments**  
**Fruiting Vegetables Grown In Commercial Greenhouses**

**Eggplant, Ground cherry, Pepinos, Peppers, Tomatillo and Tomato**

Target Pests	Rate (fl ozs/A)	Rate (lbs ai/A)	Comments
<b>Worms:</b> Alfalfa looper ( <i>Autographa californica</i> ) Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Fall armyworm ( <i>S. frugiperda</i> ) Hornworms ( <i>Manduca quinquemaculata</i> ) Southern armyworm ( <i>S. eridania</i> ) Tobacco budworm ( <i>H. virescens</i> ) Tomato fruitworm ( <i>Heliothis zea</i> ) Tomato pinworm ( <i>Keiferia lycopersicella</i> ) Yellowstriped armyworm ( <i>S. ornithogalli</i> )	6.5 to 13	0.10 to 0.20	Apply as required by scouting. Apply in a spray volume between 5 and 100 gallons per acre.  Repeat applications as needed (usually 5 to 10 days) for control, but allow at least 5-7 days between applications. Use a longer time interval when infestations are light to moderate; shorten the time interval for heavier infestations.
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.	6.5 to 13	0.10 to 0.20	Use lower rates when populations are at action thresholds and higher rates when populations are heavy and causing damage.
<b>Thrips:</b> Melon thrips ( <i>Thrips palmi</i> ) Onion thrips ( <i>Thrips tabaci</i> ) Western flower thrips ( <i>Frankliniella occidentalis</i> )	9.8 to 13	0.15 to 0.20	

**ORNAMENTAL CROPS GROWN IN COMMERCIAL GREENHOUSES**

On greenhouse ornamentals, A103.02 is broad-spectrum and controls mites, insects and foliar nematodes. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage.

**Use Restrictions for Ornamental Crops Grown in Commercial Greenhouses**

- Apply A103.02 according to the product guidelines and restrictions stated in the "USE RESTRICTIONS" and "Resistance Management" sections of this label.
- Do not apply more than 41 fl ozs of A103.02 per 100 gallons per crop per season or 0.64 lb of active ingredient per 100 gallons per crop per season in ornamentals grown in commercial greenhouses (start to finish for one ornamental crop).
- It is unlawful to use a tank-mixture with A103.02 outdoors.

**Crop Tolerance:** Although A103.02 has been shown to be safe to many ornamental species when used according to label use directions, not all ornamental plant species and cultivars have been tested for tolerance to A103.02, tank-mix combinations of A103.02, or pesticide treatments before or after those of A103.02. Also, since local conditions can influence plant tolerance, they may not match the conditions under which testing of A103.02 was conducted.

**Sensitive Ornamental Plant Species:** Some ornamental plant species have been found, under certain conditions, to be less tolerant to A103.02 when used according to label directions. Phytotoxicity is likely to occur if A103.02 is applied to the following ornamental plant species: Dianthus (*Dianthus* spp.) including carnations, pinks and Sweet William varieties, Kalanchoe (*Kalanchoe blossfeldiana*), Poinsettia (*Euphorbia*

*pulcherrima*), Roses (*Rosa* spp.), Salvia (*Salvia* spp.) and Zinnia (*Zinnia* spp.).

If application is made to these sensitive ornamental plant species it is made at grower risk.

Follow these suggestions to reduce potential injury to ornamentals: (1) Do not apply to plugs in their early stages of development (1 to 2 leaf) as injury to some tender crops could occur. If application to plugs is necessary, test A103.02 on a small number of plants before doing large scale treatments. (2) Apply A103.02 during the coolest parts of the day and always apply prior to blooming or avoid applications to blooms where possible. (3) Prior to application, evaluate for potential phytotoxicity of all tank mixes with additives or other pesticide products. Additives, including spray adjuvants, are not necessary for use with A103.02. Crop oils, surfactants and fertilizer adjuvants have been shown to increase the likelihood of phytotoxicity and are not recommended with A103.02. If greenhouses are under high temperature conditions, use caution whenever including an additive with A103.02 because the injury potential is higher. Do not tank mix with products that contain a label prohibition against tank mixing. Apply the tank mix to a small area (8 to 12 plants) and evaluate for 3 to 5 days before attempting a large-scale spray to make certain that no phytotoxicity occurs.

#### A103.02 Application Rates and Comments Greenhouse Grown Ornamentals

Target Pests	Rate (fl ozs/ 100 gals)	Rate (lbs ai/100 gals)	Comments
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Citrus budmite ( <i>Eriophyes sheldoni</i> ) Cyclamen mite ( <i>Phytonemus pallidus</i> ) Rust mite ( <i>Phyllocoptura</i> spp., <i>Epitrimerus</i> spp. and <i>Aculus</i> spp.) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.)	2.6 to 5.2	0.04 to 0.08	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when mites first appear, before crop damage occurs.  Use A103.02 at 2.6 to 5.2 fl oz/100 gallons for 14 to 21 day control of low to moderate populations of mites.  Against high mite populations, or a generally high infestation across multiple crops in the same greenhouse, apply A103.02 at 5.2 fl ozs/100 gallons. Make a sequential application at 5 to 7 days after the first application to maintain control. Make only one sequential application.  A103.02 is not systemic and does not translocate throughout the plant, but it is translaminar and moves rapidly from the top to the underside of a leaf to control mites.  A103.02 will be diluted in rapidly expanding, new foliage as compared to the concentration in the leaf surface at the time of application. The sequential application mentioned above is important to maintain control.

**A103.02 Application Rates and Comments  
Greenhouse Grown Ornamentals**

<b>Target Pests</b>	<b>Rate (fl ozs/ 100 gals)</b>	<b>Rate (lbs ai/100 gals)</b>	<b>Comments</b>
<b>Worms:</b> Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Soybean looper ( <i>Pseudoplusia includes</i> )	2.6 to 6.4	0.04 to 0.10	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when worms first appear, before crop damage occurs.
Foliar nematodes ( <i>Aphelenchoides</i> spp.)	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage.  Apply an initial application at 5.2 fl ozs /100 gallons when first signs of plant damage or nematodes are observed, followed by a second application at 5.2 fl ozs/100 gallons 7 to 14 days later.  A third application at 5.2 fl ozs/100 gallons can be made at 4 to 6 weeks after the initial application if plant damage or nematodes are detected.  To improve nematode control, add an IGR (insect growth regulator) or second MOA (Mode of Action) product registered for this use as a tank mixture.
Fungus gnats ( <i>Bradysia</i> spp.)	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when fungus gnats are in the early larval stage.  A103.02 will not control emerged adults, therefore, add an IGR or second MOA product registered for this use as a tank mixture.
<b>Thrips:</b> Chilli thrips ( <i>Scirtothrips dorsalis</i> Hood) Western flower thrips ( <i>Frankliniella occidentalis</i> )	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage.  Apply when thrips are immature and when populations are building, before crop damage occurs.  Western flower thrips are difficult to control because they may be concealed in blooms. Combinations with other effective insecticides will enhance overall control.  Alternation with other MOA products such as <b>Overture® 35 WP</b> insecticide or <b>Mesuro® 75-W</b> can help prevent resistance development. Incorporate an IGR such as <b>Pedestal® novaluron</b> insecticide in your spray program.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

#### Pesticide Storage

Keep A103.02 in its tightly closed original container, when not in use. Do not store below 32° F. Do not store in direct sunlight. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

#### Pesticide Disposal

Wastes resulting from the use of A103.02 may be disposed of on-site or at an approved waste disposal facility.

#### Container Disposal

**Nonrefillable Container:** Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying (see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons) as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and contain the spill with inert material (sand, earth, etc.) and transfer liquid and solid diking material to separate containers for disposal. Keep the spill out of all sewers and open bodies of water.

### LIMITATION OF WARRANTY AND LIABILITY

**IMPORTANT: READ BEFORE USE.** Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of ATTICUS, LLC. All such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** To the extent consistent with applicable law, ATTICUS, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

**LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, neither ATTICUS, LLC the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent

with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

Mesuroi is a registered trademark of Bayer AG, Germany

Overture is a registered trademark of Valent U.S.A. Corporation

Pedestal is a registered trademark of Makhteshim Agan of North America.

A103.02 is not manufactured or distributed by BASF Corporation, seller of Pylon®.

Pylon® is a registered trademark of BASF Corporation.

{LANGUAGE ON LABEL AFFIXED TO  
CONTAINER}

**A103.02**

For Use Only On Fruiting Vegetables and Ornamental Crops Grown  
In Commercial Greenhouses

**Active Ingredient:**

(% by weight)

Chlorfenapyr\* ..... 21.4%  
Other Ingredients ..... 78.6%  
Total ..... 100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-  
pyrrole-3-carbonitrile

Contains 2.0 pounds of chlorfenapyr per gallon.

Contains chlorfenapyr, the active ingredient used in Pylon®.

See label booklet for First Aid, additional Precautionary Statements and  
Directions for Use.

[Note to reviewer: The label booklet shall be securely attached to the  
immediate container]

**Manufactured For:**

Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

EPA Reg. No.: 91234-XX

EPA Est. No.:

**Net Contents:**

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

Si usted no entiende la etiqueta, busque a alguien para que se la  
explique a usted en detalle. (If you do not understand the label, find  
someone to explain it to you in detail.)

**Precautionary Statements**

**Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin.  
Causes moderate eye irritation. Avoid breathing vapors or spray mist.  
Avoid contact with skin, eyes or clothing. Wash hands thoroughly with  
soap and water after handling and before eating, drinking, chewing gum,  
using tobacco, or using the toilet. Remove and wash contaminated  
clothing before reuse.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage**

Keep A103.02 in its tightly closed original container, when not in use. Do  
not store below 32° F. Do not store in direct sunlight. Store in a cool, dry  
(preferably locked) area that is inaccessible to children and animals.

**Pesticide Disposal**

Wastes resulting from the use of A103.02 may be disposed of on-site or  
at an approved waste disposal facility.

**Container Disposal**

**Nonrefillable Container:** Do not reuse or refill this container. Triple  
rinse or pressure rinse container (or equivalent) promptly after emptying  
(see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons)  
as follows:** Empty the remaining contents into application equipment or a  
mix tank and drain for 10 seconds after the flow begins to drip. Fill the  
container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate  
into application equipment or a mix tank, or store rinsate for later use or  
disposal. Drain for 10 seconds after the flow begins to drip. Repeat this  
procedure two more times. Offer for recycling if available for  
reconditioning if appropriate, or puncture and dispose of in a sanitary  
landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into  
application equipment or mix tank and continue to drain for 10 seconds  
after the flow begins to drip. Hold container upside down over application  
equipment or mix tank, or collect rinsate for later use or disposal. Insert  
pressure rinsing nozzle in the side of the container and rinse at about 40  
PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to  
drip. Offer for recycling if available for reconditioning if appropriate, or  
puncture and dispose of in a sanitary landfill, or by other procedures  
approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and  
contain the spill with inert material (sand, earth, etc.) and transfer liquid  
and solid diking material to separate containers for disposal. Keep the  
spill out of all sewers and open bodies of water.

Decision Seq: 518428 Action Code: R301,NEW PRODUCT;IDENTICAL OR SUBSTANTIALLY SIMILA

FFS Start Date: 07-Jul-2016

Tentative Ind: No

Start/Stop Clock

FQPA Clock:

Due Date: 07-Nov-2016

75-Day Due Date:

Days Elapsed:

OPP Target Due Date:

21-Day Due Date: 07-Jul-2016

FFS Original Decision:

Negotiated Due Date:

45-Day Due Date: 22-Aug-2016

Registrant

Predecisional

Due Date: 24-Oct-2016

Add to Bundle?

Response Due Date:

Due Date:

Current Status: CLOSED (07-Nov-2016)

Bundle ID:

Decision Status -

Tracking

Create Resubmission

FFS Letters

Waiver Documentation

Action Code History

Secondary Decision

Decision Bundle

75 Day Letters

45/90 Day Screen

Primary Decisions

Decision Milestone

FFS Negotiated Due Dates

OPP Target Due Date

Decision Comments

Payment

Unmatched Payments

Decision Ownership

Receipts

Data Package

Reduced Risk

Meetings &amp; Milestones

FFS Information

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
S: 994579	Rodia, Carmen	91234-19	07-Nov-2016	OBJECTION - LABEL DEFICIENCY Resubmitted for updated label.
S: 994581	Rodia, Carmen	91234-19	07-Nov-2016	3(c)(7)(A) Conditional Registration Submission of final updated master label.
S: 987841	Rodia, Carmen	91234-19	07-Nov-2016	OBJECTION - LABEL DEFICIENCY Initial application for registration of new chlorfenapyr product.

Viewing Record 1 of 1



## Rodia, Carmen

---

**From:** Nicole O'Loughlin <Nicole@PyxisRC.com>  
**Sent:** Thursday, November 03, 2016 5:20 PM  
**To:** Rodia, Carmen  
**Cc:** McCall, Deborah; Gebken, Richard  
**Subject:** RE: Label Review Comments for EPA File Symbol 91234-RO (A103.02)  
**Attachments:** 091234-xxxxx.20161103 A103.02 Label\_clean.pdf; 091234-xxxxx.20161103 A103.02 Label\_tracked.pdf

Carmen,

I have updated the label based on your comments. I have also taken this opportunity to add the following contains statement to the front panel of the booklet and to the base label, "Contains chlorfenapyr, the active ingredient used in Pylon®." The accompanying trademark statements have been added to the last page of the booklet label, "A103.02 is not manufactured or distributed by BASF Corporation, seller of Pylon®," and "Pylon® is a registered trademark of BASF Corporation."

Please let me know if you require anything further to continue your review.

Regards,  
Nicole

**Nicole O'Loughlin**  
**Pyxis Regulatory Consulting, Inc.**  
4110 136th St. Ct. NW  
Gig Harbor, WA 98332  
(T): (253) 853-7369  
(F): (253) 853-5516  
(E): [Nicole@PyxisRC.com](mailto:Nicole@PyxisRC.com)

---

**From:** Rodia, Carmen [<mailto:Rodia.Carmen@epa.gov>]  
**Sent:** Thursday, November 03, 2016 10:26 AM  
**To:** Nicole O'Loughlin <Nicole@PyxisRC.com>  
**Cc:** McCall, Deborah <McCall.Deborah@epa.gov>; Gebken, Richard <Gebken.Richard@epa.gov>  
**Subject:** Label Review Comments for EPA File Symbol 91234-RO (A103.02)

Nicole, in anticipation of stamping a "clean label" with no comments in support of the R301 pending new product registration for EPA File Symbol 91234-RO (A103.02), I have incorporated label review comments that will need to be worked into an updated master label. I have also attached a copy of the completed acute toxicity review for your use and reference.

**PLEASE NOTE: The PRIA conclusion date for this R301 pending new product registration is Monday, November 7, 2016, and I will need you to submit the updated master label as soon as possible so that we can meet your PRIA date for this new product.**

If you have any questions, please contact me directly. Once the master label has been updated, please e-mail it to me for future use in completing the new product registration. Regards, Carmen Rodia.

*Carmen J. Rodia, Jr.*

Carmen J. Rodia, Jr.  
Environmental Protection Specialist  
U.S. EPA, Office of Pesticide Programs,  
Registration Division, Invertebrate & Vertebrate Branch 2  
1200 Pennsylvania Avenue, NW (7504P)

Washington, DC 20460-0001  
(703) 306-0327 (tel)  
(703) 308-0029 (fax)  
[Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov)

[Note to reviewer: [Text] in brackets denotes optional text.]

[Note to reviewer: {Text} in braces denotes where in the final label text will appear.]

## {BOOKLET FRONT PANEL LANGUAGE}

GROUP

13

INSECTICIDE

# A103.02

For Use Only On Fruiting Vegetables and Ornamental Crops Grown in Commercial Greenhouses

Active Ingredient:	(% by weight)
Chlorfenapyr*: .....	21.4%
Other Ingredients .....	78.6%
Total .....	100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile

Contains 2.0 pounds of ~~active ingredient~~chlorfenapyr per gallon.

Contains chlorfenapyr, the active ingredient used in Pylon®.

## KEEP OUT OF REACH OF CHILDREN CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See inside label booklet for First Aid, Precautionary Statements and Directions for Use.

**Manufactured For:**  
Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

**EPA Reg. No.: 91234-XX**  
**EPA Est. No.:**

**Net Contents:**

# { LANGUAGE INSIDE BOOKLET }

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
IF INHALED	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance; then give artificial respiration, preferably by mouth to mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
IF IN EYES	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBERS</b> Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical assistance, call SafetyCall; additional information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), you may call SafetyCall® at 1-844-685-9173, 24 hours per day, 7 days per week. For chemical emergency: spill, leak, fire, exposure or accident, you may call CHEMTREC: 1-800-424-9300.	

**For Chemical Emergency**  
**Spill, Leak, Fire, Exposure, or Accident**  
**Call CHEMTREC Day or Night**  
**Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)**

### Precautionary Statements

#### Hazards to Humans and Domestic Animals

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin. Causes moderate eye irritation. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

#### Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. ~~If you want more options, follow instructions for Category C on an EPA chemical resistance category selection chart.~~

**Applicators and Other Handlers Must Wear:** (1) long-sleeved shirt and long pants; (2) chemical-resistant gloves, such as barrier ~~Barrier laminate~~ lamine ( $> 14$  mils), butyl ~~Butyl rubber~~ Rubber ( $> 14$  mils), nitrile ~~Nitrile rubber~~ Rubber ( $> 14$  mils), neoprene ~~Neoprene rubber~~ Rubber ( $> 14$  mils), polyvinyl ~~Polyvinyl chloride~~ Chloride (PVSPVC), or Viton ( $\geq 14$  mils); (3) shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with the product's concentrate. **Do not** reuse them.

#### Engineering Controls Statement

When handlers use closed systems or enclosed cabs in a manner that meets the requirements of the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240 (d) (4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

**IMPORTANT:** When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for **applicators and other handlers**, and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown.

#### USER SAFETY RECOMMENDATIONS

**Users should:** (1) Wash hands thoroughly before eating, drinking, chewing gum, using tobacco, or using the toilet. (2) Remove contaminated clothing/PPE immediately and then wash thoroughly and change into clean clothing. (3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### Environmental Hazards

This pesticide is toxic to aquatic organisms, birds, and wildlife. ~~Do not apply directly to water or to areas where surface water is present. Avoid spraying ponds or aquaria containing fish. Runoff from treated areas may be hazardous to aquatic organisms in neighboring areas.~~

This product is toxic to bees exposed to direct treatment on blooming crops or weeds. **Do not** apply this product or allow it to drift to blooming crops or weeds if bees are visiting actively foraging in the treatment area.

**Do not** contaminate water by cleaning of equipment or when disposing of equipment washwaters or rinsate. **Do not** discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or regional office of the EPA. **Do not** discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge.

#### Physical or Chemical Hazards

**Do not** apply this product around electrical equipment due to the possibility of shock hazard. **Do not mix**

or allow this product to come into contact with an oxidizing agent. Hazardous chemical reaction may occur.

#### **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation

#### **USE RESTRICTIONS**

- Do not apply A103.02 except as specified on this label.
- Do not apply A103.02 in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application.
- Do not use A103.02 on any other crops except fruiting vegetable crops and ornamental crops grown in commercial greenhouses.
- Do not contaminate food or feedstuffs.
- Do not compost any discarded plant materials that have been treated with A103.02.
- Do not apply A103.02 through any type of irrigation system.
- Do not tank mix with products that contain a label prohibition against tank mixing.
- Do not apply more than three (3) applications of A103.02 during a crop growing cycle.
- Do not use A103.02 to formulate, reformulate or repackage into any other pesticide product without the written permission of Atticus, LLC.
- Do not apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle in fruiting vegetables.
- It is unlawful to use A103.02 on anything other than ornamental crops or fruiting vegetable crops in commercial greenhouses.

#### **AGRICULTURAL USE REQUIREMENTS**

Use this product only in accordance with its labeling and with the Worker Protection Standard (WPS), 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval.

**Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.**

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: (1) Coveralls; (2) Chemical-resistant gloves, such as Barrier Laminate (> 14 mils), Butyl Rubber (> 14 mils), Nitrile Rubber (> 14 mils), Neoprene Rubber (> 14 mils), Polyvinyl Chloride (PVC) barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride (PVC) or Viton (≥ 14 mils); (3) Shoes plus socks.

#### **A103.02 USE RESTRICTIONS**

- ~~Do not apply A103.02 except as specified on this label.~~
- ~~Do not apply A103.02 in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application.~~
- ~~Do not use A103.02 on any other crops except fruiting vegetable crops and ornamental crops grown in commercial greenhouses.~~
- ~~Do not contaminate food or feedstuffs.~~
- ~~Do not compost any discarded plant materials that have been treated with A103.02.~~
- ~~Do not apply A103.02 through any type of irrigation system.~~

- ~~Do not tank mix with products that contain a label prohibition against tank mixing.~~
- ~~Do not apply more than three (3) applications of A103.02 during a crop growing cycle.~~
- ~~Do not use A103.02 to formulate, reformulate or repackage into any other pesticide product without the written permission of Atticus, LLC.~~

### **GENERAL PRODUCT INFORMATION**

A103.02 is a broad-spectrum insecticide-miticide for use on greenhouse grown fruiting vegetables and greenhouse grown ornamentals. It has excellent stomach activity when ingested and good contact activity when pests come in contact with it. A103.02 is classified in a class of insecticides-miticides called Pyrroles. Members of this class of products have a similar mode of action that involves uncoupling oxidative phosphorylation and preventing conversion of ADP to ATP which affects energy metabolism so that mites and insects cannot generate enough energy to survive.

A103.02 does not have ovicidal activity. Therefore, it should be used in combination with a registered miticide or insecticide with ovicidal activity if moderate to heavy numbers of mite or insect eggs are present at application time.

**Resistance Management:** All crop protection chemicals should be used in resistance pest management programs suitable for the crop-pest complex involved. The program should involve different classes of chemistry in the control of the pests. For more information on insect resistance, contact the local Cooperative Extension Service for suggestions on minimizing insect resistance.

When using A103.02 in greenhouses, **do not** apply more than two (2) consecutive applications before rotating to an insecticide-miticide with a different mode of action. In addition, **do not** apply A103.02 to consecutive crops in the commercial greenhouse unless applied in combination with another insecticide-miticide with a different mode of action.

**Mixing Instructions:** Agitate or shake A103.02 containers prior to use in order to prepare a uniform spray solution. Add  $\frac{1}{2}$  to  $\frac{3}{4}$  of the required amount of clean water to the spray tank and start agitation. Measure the required amount of A103.02 with a calibrated measuring device and add to the spray tank while agitating. Add the rest of the water and continue with agitation. If preparing a tank-mixture, add A103.02 to the tank first and be sure that it is fully dispersed in water before adding the additional materials. To prevent waste and disposal of used spray solution, it is best to prepare no more spray solution than is needed for the immediate operation.

**Compatibility:** Although A103.02 is compatible with many spray products, a full range of compatibilities under all local conditions has not been evaluated. Therefore, the compatibility of any mixture with A103.02 must be determined using a jar test. Conduct a jar test by adding proportionate amounts of each ingredient of the tank-mixture to a pint or quart jar. Cap, shake, and let sit for at least 15 minutes. If a precipitate forms and it cannot be readily re-dispersed, do not use the mixture because it is incompatible.

**Tank Mixing:** As stated above, if using A103.02 in a tank-mixture, always add A103.02 to the spray tank first and make sure it is fully dispersed in water before adding any other tank-mix product. Follow all applicable directions, restrictions and precautions on the label for the tank mix partners. The most restrictive labeling applies when using a tank mix. **Do not** tank mix with products that contain a label prohibition against tank mixing. **It is unlawful to tank mix A103.02 if the tank mix will be used outdoors.**

### **FRUITING VEGETABLE CROPS GROWN IN COMMERCIAL GREENHOUSES**

**A103.02** is broad-spectrum and can be used to control insect and mite pests on greenhouse grown fruiting vegetables such as eggplant, groundcherry, pepino, pepper, tomatillo and tomato. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage. A103.02 can be applied up to and including the day of

harvest.

#### Use Restrictions for Greenhouse-Fruiting Vegetables Grown in Commerical Greenhouses

- Apply A103.02 according to the product guidelines and restrictions stated in the "A103.02-USE RESTRICTIONS" and "GENERAL INFORMATIONResistance Management" sections of this label.
- Do not apply A103.02 as an ultra low volume (ULV) spray.
- Do not use on tomato varieties with a mature fruit diameter of less than one (1) inch.
- Allow at least 5 to 7 days between applications.
- Do not apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle in fruiting vegetables grown in commercial greenhouses.
- It is unlawful to use a tank-mixture with A103.02 outdoors.

#### A103.02 Application Rates and Comments Fruiting Vegetables Grown In Commercial Greenhouses

##### Eggplant, Ground cherry, Pepinos, Peppers, Tomatillo and Tomato

Target Pests	Rate (fl ozs/A)	Rate (lbs ai/A)	Comments
<b>Worms:</b> Alfalfa looper ( <i>Autographa californica</i> ) Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Fall armyworm ( <i>S. frugiperda</i> ) Hornworms ( <i>Manduca quinquemaculata</i> ) Southern armyworm ( <i>S. eridania</i> ) Tobacco budworm ( <i>H. virescens</i> ) Tomato fruitworm ( <i>Heliothis zea</i> ) Tomato pinworm ( <i>Keiferia lycopersicella</i> ) Yellowstriped armyworm ( <i>S. ornithogalli</i> )	6.5 to 13	0.10 to 0.20	Apply as required by scouting. Apply in a spray volume between 5 and 100 gallons per acre.  Repeat applications as needed (usually 5 to 10 days) for control, but allow at least 5-7 days between applications. Use a longer time interval when infestations are light to moderate; shorten the time interval for heavier infestations.
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.	6.5 to 13	0.10 to 0.20	Use lower rates when populations are at action thresholds and higher rates when populations are heavy and causing damage.
<b>Thrips:</b> Melon thrips ( <i>Thrips palmi</i> ) Onion thrips ( <i>Thrips tabaci</i> ) Western flower thrips ( <i>Frankliniella occidentalis</i> )	9.8 to 13	0.15 to 0.20	

#### ORNAMENTAL CROPS GROWN IN COMMERCIAL GREENHOUSES

On greenhouse ornamentals, A103.02 is broad-spectrum and controls mites, insects and foliar nematodes. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage.

#### Use Restrictions for Greenhouse-Ornamental Crops Grown in Commercial Greenhouses

- Apply A103.02 according to the product guidelines and restrictions stated in the "A103.02-USE RESTRICTIONS" and "GENERAL INFORMATIONResistance Management" sections of this label.
- Do not apply more than 41 fl ozs of A103.02 per 100 gallons per crop per season or 0.64 lb of



active ingredient per 100 gallons per crop per season in greenhouse-ornamentals grown in commercial greenhouses (start to finish for one ornamental crop).

- It is unlawful to use a tank-mixture with A103.02 outdoors.

**Crop Tolerance:** Although A103.02 has been shown to be safe to many ornamental species when used according to label use directions, not all ornamental plant species and cultivars have been tested for tolerance to A103.02, tank-mix combinations of A103.02, or pesticide treatments before or after those of A103.02. Also, since local conditions can influence plant tolerance, they may not match the conditions under which testing of A103.02 was conducted.

**Sensitive Ornamental Plant Species:** Some ornamental plant species have been found, under certain conditions, to be less tolerant to A103.02 when used according to label directions. Phytotoxicity is likely to occur if A103.02 is applied to the following ornamental plant species: Dianthus (*Dianthus* spp.) including carnations, pinks and Sweet William varieties, Kalanchoe (*Kalanchoe blossfeldiana*), Poinsettia (*Euphorbia pulcherrima*), Roses (*Rosa* spp.), Salvia (*Salvia* spp.) and Zinnia (*Zinnia* spp.).

**If application is made to these sensitive ornamental plant species it is made at grower risk.**

**Follow these suggestions to reduce potential injury to ornamentals:** (1) Do not apply to plugs in their early stages of development (1 to 2 leaf) as injury to some tender crops could occur. If application to plugs is necessary, test A103.02 on a small number of plants before doing large scale treatments. (2) Apply A103.02 during the coolest parts of the day and always apply prior to blooming or avoid applications to blooms where possible. (3) Prior to application, evaluate for potential phytotoxicity of all tank mixes with additives or other pesticide products. Additives, including spray adjuvants, are not necessary for use with A103.02. Crop oils, surfactants and fertilizer adjuvants have been shown to increase the likelihood of phytotoxicity and are not recommended with A103.02. If greenhouses are under high temperature conditions, use caution whenever including an additive with A103.02 because the injury potential is higher. Do not tank mix with products that contain a label prohibition against tank mixing. Apply the tank mix to a small area (8 to 12 plants) and evaluate for 3 to 5 days before attempting a large-scale spray to make certain that no phytotoxicity occurs.

#### A103.02 Application Rates and Comments Greenhouse Grown Ornamentals

Target Pests	Rate (fl ozs/ 100 gals)	Rate (lbs ai/100 gals)	Comments
--------------	-------------------------------	------------------------------	----------

<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Citrus budmite ( <i>Eriophyes sheldoni</i> ) Cyclamen mite ( <i>Phytonemus pallidus</i> ) Rust mite ( <i>Phyllocoptruta</i> spp., <i>Epirimerus</i> spp. and <i>Aculus</i> spp.) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.)	2.6 to 5.2	0.04 to 0.08	<p>Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when mites first appear, before crop damage occurs.</p> <p>Use A103.02 at 2.6 to 5.2 fl oz/100 gallons for 14 to 21 day control of low to moderate populations of mites.</p> <p>Against high mite populations, or a generally high infestation across multiple crops in the same greenhouse, apply A103.02 at 5.2 fl ozs/100 gallons. Make a sequential application at 5 to 7 days after the first application to maintain control. Make only one sequential application.</p> <p>A103.02 is not systemic and does not translocate throughout the plant, but it is translaminar and moves rapidly from the top to the underside of a leaf to control mites.</p> <p>A103.02 will be diluted in rapidly expanding, new foliage as compared to the concentration in the leaf surface at the time of application. The sequential application mentioned above is important to maintain control.</p>
--	------------	--------------	---

**A103.02 Application Rates and Comments  
Greenhouse Grown Ornamentals**

Target Pests	Rate (fl ozs/ 100 gals)	Rate (lbs ai/100 gals)	Comments
<b>Worms:</b> Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Soybean looper ( <i>Pseudoplusia includes</i>	2.6 to 6.4	0.04 to 0.10	<p>Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when worms first appear, before crop damage occurs.</p>
Foliar nematodes ( <i>Aphelenchoides</i> spp.)	5.2 to 10	0.08 to 0.16	<p>Use sufficient spray volume to ensure thorough and complete coverage of foliage.</p> <p>Apply an initial application at 5.2 fl ozs /100 gallons when first signs of plant damage or nematodes are observed, followed by a second application at 5.2 fl ozs/100 gallons 7 to 14 days later.</p> <p>A third application at 5.2 fl ozs/100 gallons can be made at 4 to 6 weeks after the initial application if plant damage or nematodes are detected.</p>

			To improve nematode control, add an IGR (insect growth regulator) or second MOA (Mode of Action) product registered for this use as a tank mixture.
Fungus gnats ( <i>Bradysia</i> spp.)	5.2 to 10	0.08 to 0.16	<p>Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when fungus gnats are in the early larval stage.</p> <p>A103.02 will not control emerged adults, therefore, add an IGR or second MOA product registered for this use as a tank mixture.</p>
<b>Thrips:</b> Chilli thrips ( <i>Scirtothrips dorsalis</i> Hood) Western flower thrips ( <i>Frankliniella occidentalis</i> )	5.2 to 10	0.08 to 0.16	<p>Use sufficient spray volume to ensure thorough and complete coverage of foliage.</p> <p>Apply when thrips are immature and when populations are building, before crop damage occurs.</p> <p>Western flower thrips are difficult to control because they may be concealed in blooms. Combinations with other effective insecticides will enhance overall control.</p> <p>Alternation with other MOA products such as <b>Overture® 35 WP insecticide</b> or <b>Mesuro® 75-W</b> can help prevent resistance development. Incorporate an IGR such as <b>Pedestal® novaluron insecticide</b> in your spray program.</p>

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

##### **Pesticide Storage**

Keep A103.02 in its tightly closed original container, when not in use. **Do not** store below 32° F. **Do not** store in direct sunlight. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

##### **Pesticide Disposal**

Wastes resulting from the use of A103.02 may be disposed of on-site or at an approved waste disposal facility.

##### **Container Disposal**

**Nonrefillable Container:** Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying (see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons) as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and contain the spill with inert material (sand, earth, etc.) and transfer liquid and solid diking material to separate containers for disposal. Keep the spill out of all sewers and open bodies of water.

#### LIMITATION OF WARRANTY AND LIABILITY

**IMPORTANT: READ BEFORE USE.** Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of ATTICUS, LLC. All such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** To the extent consistent with applicable law, ATTICUS, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

**LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, neither ATTICUS, LLC the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent

with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

Mesuroi is a registered trademark of Bayer AG, Germany

Overture is a registered trademark of Valent U.S.A. Corporation

Pedestal is a registered trademark of Makhteshim Agan of North America.

A103.02 is not manufactured or distributed by BASF Corporation, seller of Pylon®.

Pylon® is a registered trademark of BASF Corporation.

**{LANGUAGE ON LABEL AFFIXED TO  
CONTAINER}**

**A103.02**

**For Use Only On Fruiting Vegetables and Ornamental Crops Grown  
in Commercial Greenhouses**

**Active Ingredient:**

(% by weight)

Chlorfenapyr\*: ..... 21.4%  
Other Ingredients ..... 78.6%  
Total ..... 100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-  
pyrrole-3-carbonitrile

Contains 2.0 pounds of active ingredient chlorfenapyr per gallon.

Contains chlorfenapyr, the active ingredient used in Pylon®.

See label booklet for First Aid, additional Precautionary Statements and  
Directions for Use.

[Note to reviewer: The label booklet shall be securely attached to the  
immediate container]

**Manufactured For:**

Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

**EPA Reg. No.: 91234-XX**

**EPA Est. No.:**

**Net Contents:**

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

Si usted no entiende la etiqueta, busque a alguien para que se la  
explique a usted en detalle. (If you do not understand the label, find  
someone to explain it to you in detail.)

**Precautionary Statements**

**Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin.  
Causes moderate eye irritation. Avoid breathing vapors or spray mist.  
Avoid contact with skin, eyes or clothing. Wash hands thoroughly with  
soap and water after handling and before eating, drinking, chewing gum,  
using tobacco, or using the toilet. Remove and wash contaminated  
clothing before reuse.

**STORAGE AND DISPOSAL**

**Do not** contaminate water, food or feed by storage or disposal.

**Pesticide Storage**

Keep A103.02 in its tightly closed original container, when not in use. **Do  
not** store below 32° F. **Do not** store in direct sunlight. Store in a cool, dry  
(preferably locked) area that is inaccessible to children and animals.

**Pesticide Disposal**

Wastes resulting from the use of A103.02 may be disposed of on-site or  
at an approved waste disposal facility.

**Container Disposal**

**Nonrefillable Container:** **Do not reuse or refill this container.** Triple  
rinse or pressure rinse container (or equivalent) promptly after emptying  
(see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons)  
as follows:** Empty the remaining contents into application equipment or a  
mix tank and drain for 10 seconds after the flow begins to drip. Fill the  
container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate  
into application equipment or a mix tank, or store rinsate for later use or  
disposal. Drain for 10 seconds after the flow begins to drip. Repeat this  
procedure two more times. Offer for recycling if available for  
reconditioning if appropriate, or puncture and dispose of in a sanitary  
landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into  
application equipment or mix tank and continue to drain for 10 seconds  
after the flow begins to drip. Hold container upside down over application  
equipment or mix tank, or collect rinsate for later use or disposal. Insert  
pressure rinsing nozzle in the side of the container and rinse at about 40  
PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to  
drip. Offer for recycling if available for reconditioning if appropriate, or  
puncture and dispose of in a sanitary landfill, or by other procedures  
approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and  
contain the spill with inert material (sand, earth, etc.) and transfer liquid  
and solid diking material to separate containers for disposal. Keep the  
spill out of all sewers and open bodies of water.

## Rodia, Carmen

---

**From:** Rodia, Carmen  
**Sent:** Thursday, November 03, 2016 1:26 PM  
**To:** Nicole O'Loughlin  
**Cc:** McCall, Deborah; Gebken, Richard  
**Subject:** Label Review Comments for EPA File Symbol 91234-RO (A103.02)  
**Attachments:** 91234-19 (A103.02), Similarity Clinic Memorandum (07-05-16).pdf; 91234-RO(19) (A103.02), Marked Up Label (11-03-16).pdf

Nicole, in anticipation of stamping a "clean label" with no comments in support of the R301 pending new product registration for EPA File Symbol 91234-RO (A103.02), I have incorporated label review comments that will need to be worked into an updated master label. I have also attached a copy of the completed acute toxicity review for your use and reference.

**PLEASE NOTE: The PRIA conclusion date for this R301 pending new product registration is Monday, November 7, 2016, and I will need you to submit the updated master label as soon as possible so that we can meet your PRIA date for this new product.**

If you have any questions, please contact me directly. Once the master label has been updated, please e-mail it to me for future use in completing the new product registration. Regards, Carmen Rodia.

*Carmen J. Rodia, Jr.*

Carmen J. Rodia, Jr.  
Environmental Protection Specialist  
U.S. EPA, Office of Pesticide Programs,  
Registration Division, Invertebrate & Vertebrate Branch 2  
1200 Pennsylvania Avenue, NW (7504P)  
Washington, DC 20460-0001  
(703) 306-0327 (tel)  
(703) 308-0029 (fax)  
[Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov)

[Note to reviewer: [Text] in brackets denotes optional text.]

[Note to reviewer: {Text} in braces denotes where in the final label text will appear.]

## {BOOKLET FRONT PANEL LANGUAGE}

GROUP

13

INSECTICIDE

# A103.02

For Use Only On Fruiting Vegetables and Ornamental Crops Grown in Commercial Greenhouses

Active Ingredient:	(% by weight)
Chlorfenapyr*: .....	21.4%
Other Ingredients .....	78.6%
Total .....	100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile  
Contains 2.0 pounds of active ingredient per gallon.

## KEEP OUT OF REACH OF CHILDREN CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See inside label booklet for First Aid, Precautionary Statements and Directions for Use.

Manufactured For:  
Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

EPA Reg. No.: 91234-XX  
EPA Est. No.:

Net Contents:



# { LANGUAGE INSIDE BOOKLET }

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
IF INHALED	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance; then give artificial respiration, preferably by mouth to mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
IF IN EYES	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBERS</b> Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical assistance, call SafetyCall: 1-844-685-9173, or chemical emergency: spill, leak, fire, exposure or accident, call CHEMTREC: 1-800-424-9300.	

**For Chemical Emergency**  
**Spill, Leak, Fire, Exposure, or Accident**  
**Call CHEMTREC Day or Night**  
**Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)**

# Summary of Comments on US EPA, Pesticide Product Label

Page: 2

---

Number: 1	Author: crodia	Subject: Cross-Out	Date: 11/2/2016 1:08:21 PM
-----------	----------------	--------------------	----------------------------

---

Number: 2	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 12:16:41 PM
-----------	----------------	------------------------	-----------------------------

**For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), you may call SafetyCall® at 1-866-327-7282, 24 hours per day, 7 days per week.**

Number: 3	Author: crodia	Subject: Inserted Text	Date: 11/2/2016 1:06:45 PM
-----------	----------------	------------------------	----------------------------

---

you may call

### Precautionary Statements

#### Hazards to Humans and Domestic Animals

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin. Causes moderate eye irritation. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

#### Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. ☐ you want more options, follow instructions for **Category C** on an EPA chemical resistance category selection chart.

**Applicators and Other Handlers Must Wear:** (1) long-sleeved shirt and long pants; (2) chemical-resistant gloves, such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride (PVC), or Viton (≥ 14 mils); ☐ (3) shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with the product's concentrate. **Do not** reuse them.

#### Engineering Controls Statement

When handlers use closed systems or enclosed cabs in a manner that meets the requirements of the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240 (d) (4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

**IMPORTANT:** When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for **applicators and other handlers**, ☐ and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown.

#### USER SAFETY RECOMMENDATIONS

**Users should:** (1) Wash hands ☐ before eating, drinking, chewing gum, using tobacco, or using the toilet. (2) Remove contaminated clothing/PPE immediately and then wash thoroughly and change into clean clothing. (3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### Environmental Hazards

This pesticide is toxic to aquatic organisms, birds, and wildlife. ~~Do not apply directly to water or to areas where surface water is present. Avoid spraying ponds or aquaria containing fish. Runoff from treated areas may be hazardous to aquatic organisms in neighboring areas.~~ ☐

This product is toxic to bees exposed to direct treatment on blooming crops or weeds. **Do not** apply this product or allow it to drift to blooming crops or weeds if bees are ☐ sitting the treatment area.

**Do not** contaminate water by cleaning of equipment or when disposing of equipment washwaters or rinsate. **Do not** discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or regional office of the EPA. **Do not** discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge.

#### Physical or Chemical Hazards

**Do not** apply this product around electrical equipment due to the possibility of shock hazard. ☐

Number: 1	Author: crodia	Subject: Cross-Out	Date: 11/2/2016 1:17:18 PM
Number: 2	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 12:23:31 PM
chemical-resistant gloves, such as Barrier Laminate (≥ 14 mils), Butyl Rubber (≥ 14 mils), Nitrile Rubber (≥ 14 mils), Neoprene Rubber (≥ 14 mils), Polyvinyl Chloride (PVC), or Viton (≥ 14 mils)			
Number: 3	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 12:23:31 PM
handlers,			
Number: 4	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 12:23:31 PM
thoroughly			
Number: 5	Author: rgebken	Subject: Inserted Text	Date: 11/3/2016 12:26:06 PM
This text is for outdoor use sites. This is strictly greenhouse use only.			
Number: 6	Author: rgebken	Subject: Cross-Out	Date: 11/3/2016 12:24:02 PM
Replace with "actively foraging in the"			
Number: 7	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 12:23:31 PM
Do not mix or allow this product to come into contact with an oxidizing agent. Hazardous chemical reaction may occur.			

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation

### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard (WPS), 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval.

**Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.**

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: (1) Coveralls; (2) Chemical-resistant gloves, such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride (PVC) or Viton (≥ 14 mils); (3) Shoes plus socks.

### 403.02 USE RESTRICTIONS

- Do not apply A103.02 except as specified on this label.
- Do not apply A103.02 in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application.
- Do not use A103.02 on any other crops except fruiting vegetable crops and ornamental crops grown in commercial greenhouses.
- Do not contaminate food or feedstuffs.
- Do not compost any discarded plant materials that have been treated with A103.02.
- Do not apply A103.02 through any type of irrigation system.
- Do not tank mix with products that contain a label prohibition against tank mixing.
- Do not apply more than three (3) applications of A103.02 during a crop growing cycle.
- Do not use A103.02 to formulate, reformulate or repackage into any other pesticide product without the written permission of Atticus, LLC.

### GENERAL INFORMATION

A103.02 is a broad-spectrum insecticide-miticide for use on greenhouse grown fruiting vegetables and greenhouse grown ornamentals. It has excellent stomach activity when ingested and good contact activity when pests come in contact with it. A103.02 is classified in a class of insecticides-miticides called Pyrroles. Members of this class of products have a similar mode of action that involves uncoupling oxidative phosphorylation and preventing conversion of ADP to ATP which affects energy metabolism so that mites and insects cannot generate enough energy to survive.

A103.02 does not have ovicidal activity. Therefore, it should be used in combination with a registered miticide or insecticide with ovicidal activity if moderate to heavy numbers of mite or insect eggs are present at application time.

**Resistance Management:** All crop protection chemicals should be used in resistance management programs suitable for the crop-pest complex involved. The program should involve different classes of chemistry in the control of the pests. For more information on insect resistance, contact the local Cooperative Extension Service.

---

Number: 1	Author: crodia	Subject: Inserted Text	Date: 11/2/2016 1:23:36 PM
-----------	----------------	------------------------	----------------------------

---

Chemical-resistant gloves, such as Barrier Laminate ( $\geq 14$  mils), Butyl Rubber ( $\geq 14$  mils), Nitrile Rubber ( $\geq 14$  mils), Neoprene Rubber ( $\geq 14$  mils), Polyvinyl Chloride (PVC), or Viton ( $\geq 14$  mils)

---

Number: 2	Author: crodia	Subject: Sticky Note	Date: 11/3/2016 9:44:53 AM
-----------	----------------	----------------------	----------------------------

---

Please relocate the **"USE RESTRICTIONS"** subsection to appear immediately before the **"AGRICULTURAL USE REQUIREMENTS"** box

---

Number: 3	Author: crodia	Subject: Cross-Out	Date: 11/2/2016 2:26:53 PM
-----------	----------------	--------------------	----------------------------

---

---

Number: 4	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 10:40:30 AM
-----------	----------------	------------------------	-----------------------------

---

- **Do not** apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle in fruiting vegetables.
- It is unlawful to use A103.02 on anything other than ornamental crops or fruiting vegetable crops in commercial greenhouses.

---

Number: 5	Author: crodia	Subject: Inserted Text	Date: 11/2/2016 2:26:43 PM
-----------	----------------	------------------------	----------------------------

---

**PRODUCT**

---

Number: 6	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 10:53:07 AM
-----------	----------------	------------------------	-----------------------------

---

pest

---

Number: 7	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 12:29:54 PM
-----------	----------------	------------------------	-----------------------------

---

Service for suggestions on minimizing insect resistance.

When using A103.02 in greenhouses, **do not** apply more than two (2) consecutive applications before rotating to an insecticide-miticide with a different mode of action. In addition, **do not** apply A103.02 to consecutive crops in the greenhouse unless applied in combination with another insecticide-miticide with a different mode of action.

**Mixing Instructions:** Agitate or shake A103.02 containers prior to use in order to prepare a uniform spray solution. Add  $\frac{1}{2}$  to  $\frac{3}{4}$  of the required amount of clean water to the spray tank and start agitation. Measure the required amount of A103.02 with a calibrated measuring device and add to the spray tank while agitating. Add the rest of the water and continue with agitation. If preparing a tank-mixture, add A103.02 to the tank first and be sure that it is fully dispersed in water before adding the additional materials. To prevent waste and disposal of used spray solution, it is best to prepare no more spray solution than is needed for the immediate operation.

**Compatibility:** Although A103.02 is compatible with many spray products, a full range of compatibilities under all local conditions has not been evaluated. Therefore, the compatibility of any mixture with A103.02 must be determined using a jar test. Conduct a jar test by adding proportionate amounts of each ingredient of the tank-mixture to a pint or quart jar. Cap, shake, and let sit for at least 15 minutes. If a precipitate forms and it cannot be readily re-dispersed, do not use the mixture because it is incompatible.

**Tank Mixing:** As stated above, if using A103.02 in a tank-mixture, always add A103.02 to the spray tank first and make sure it is fully dispersed in water before adding any other tank-mix product. Follow all applicable directions, restrictions and precautions on the label for the tank mix partners. The most restrictive labeling applies when using a tank mix. **Do not** tank mix with products that contain a label prohibition against tank mixing. **It is unlawful to tank mix A103.02 if the tank mix will be used outdoors.**










#### **FRUITING VEGETABLE CROPS GROWN IN COMMERCIAL GREENHOUSES**

A103.02 is broad-spectrum and can be used to control insect and mite pests on greenhouse grown fruiting vegetables such as eggplant, groundcherry, pepino, pepper, tomatillo and tomato. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage. A103.02 can be applied up to and including the day of harvest.

#### **Use Restrictions for Greenhouse Fruiting Vegetables**

- Apply A103.02 according to the A103.02 **USE RESTRICTIONS** and **GENERAL INFORMATION** sections of this label.
- **Do not** apply A103.02 as an ultra low volume (ULV) spray.
- Do not use on tomato varieties with a mature fruit diameter of less than one (1) inch.
- Allow at least 5 to 7 days between applications.
- **Do not** apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle **fruiting vegetables**.
- **It is unlawful to use a tank-mixture with A103.02 outdoors.**

	Number: 1 commercial	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 10:52:14 AM
	Number: 2 <b>Fruiting Vegetables Grown in Commercial Greenhouses</b>	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 9:46:24 AM
	Number: 3	Author: crodia	Subject: Cross-Out	Date: 11/3/2016 9:47:01 AM
	Number: 4 product guidelines and restrictions stated in the	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 11:41:18 AM
	Number: 5 <b>USE RESTRICTIONS</b>	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 11:41:43 AM
	Number: 6 <b>Resistance Management</b>	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 11:42:07 AM
	Number: 7	Author: rgebken	Subject: Cross-Out	Date: 11/3/2016 12:31:00 PM
	Number: 8 fruiting vegetables grown in commercial greenhouses	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 11:43:49 AM
	Number: 9 <b>It is unlawful to use a tank-mixture with A103.02 outdoors.</b>	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 11:44:28 AM



**A103.02 Application Rates and Comments  
Fruiting Vegetables Grown In Commercial Greenhouses**

**Eggplant, Ground cherry, Pepinos, Peppers, Tomatillo and Tomato**

Target Pests	Rate (fl ozs/A)	Rate (lbs ai/A)	Comments
<b>Worms:</b> Alfalfa looper ( <i>Autographa californica</i> ) Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Fall armyworm ( <i>S. frugiperda</i> ) Hornworms ( <i>Manduca quinquemaculata</i> ) Southern armyworm ( <i>S. eridania</i> ) Tobacco budworm ( <i>H. virescens</i> ) Tomato fruitworm ( <i>Heliothis zea</i> ) Tomato pinworm ( <i>Keiferia lycopersicella</i> ) Yellowstriped armyworm ( <i>S. ornithogalli</i> )	6.5 to 13	0.10 to 0.20	Apply as required by scouting. Apply in a spray volume between 5 and 100 gallons per acre.  Repeat applications as needed (usually 5 to 10 days) for control, but allow at least 5-7 days between applications. Use a longer time interval when infestations are light to moderate; shorten the time interval for heavier infestations.
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.	6.5 to 13	0.10 to 0.20	Use lower rates when populations are at action thresholds and higher rates when populations are heavy and causing damage.
<b>Thrips:</b> Melon thrips ( <i>Thrips palmi</i> ) Onion thrips ( <i>Thrips tabaci</i> ) Western flower thrips ( <i>Frankliniella occidentalis</i> )	9.8 to 13	0.15 to 0.20	

**ORNAMENTAL CROPS GROWN IN COMMERCIAL GREENHOUSES**

On greenhouse ornamentals, A103.02 is broad-spectrum and controls mites, insects and foliar nematodes. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage.

**Use Restrictions for Greenhouse Ornamentals**

- Apply A103.02 according to the **USE RESTRICTIONS** and **"GENERAL INFORMATION"** sections of this label.
- Do not apply more than 41 fl ozs of A103.02 per 100 gallons per crop per season or 0.64 lb of active ingredient per 100 gallons per crop per season in greenhouse ornamentals start to finish for one ornamental crop).
- It is unlawful to use a tank mixture with A103.02 outdoors.

**Crop Tolerance:** Although A103.02 has been shown to be safe to many ornamental species when used according to label use directions, not all ornamental plant species and cultivars have been tested for tolerance to A103.02, tank-mix combinations of A103.02, or pesticide treatments before or after those of A103.02. Also, since local conditions can influence plant tolerance, they may not match the conditions under which testing of A103.02 was conducted.

**Sensitive Ornamental Plant Species:** Some ornamental plant species have been found, under certain conditions, to be less tolerant to A103.02 when used according to label directions. Phytotoxicity is likely to occur if A103.02 is applied to the following ornamental plant species: Dianthus (*Dianthus* spp.) including carnations, pinks and Sweet William varieties, Kalanchoe (*Kalanchoe blossfeldiana*), Poinsettia (*Euphorbia*

---

Number: 1	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 9:59:53 AM
-----------	----------------	------------------------	----------------------------

---

**Ornamental Crops Grown in Commercial Greenhouses**

---

Number: 2	Author: crodia	Subject: Cross-Out	Date: 11/3/2016 10:00:20 AM
-----------	----------------	--------------------	-----------------------------

---

---

Number: 3	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 11:36:04 AM
-----------	----------------	------------------------	-----------------------------

---

product guidelines and restrictions stated in the

---

Number: 4	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 11:37:34 AM
-----------	----------------	------------------------	-----------------------------

---

**USE RESTRICTIONS**

---

Number: 5	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 11:36:56 AM
-----------	----------------	------------------------	-----------------------------

---

**Resistance Management**

---

Number: 6	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 11:42:40 AM
-----------	----------------	------------------------	-----------------------------

---

ornamentals grown in commercial  
greenhouses

---

Number: 7	Author: crodia	Subject: Inserted Text	Date: 11/3/2016 11:38:55 AM
-----------	----------------	------------------------	-----------------------------

---

**It is unlawful to use a tank-mixture with A103.02 outdoors.**

*pulcherrima*), Roses (*Rosa* spp.), Salvia (*Salvia* spp.) and Zinnia (*Zinnia* spp.).

If application is made to these sensitive ornamental plant species it is made at grower risk.

**Follow these suggestions to reduce potential injury to ornamentals:** (1) Do not apply to plugs in their early stages of development (1 to 2 leaf) as injury to some tender crops could occur. If application to plugs is necessary, test A103.02 on a small number of plants before doing large scale treatments. (2) Apply A103.02 during the coolest parts of the day and always apply prior to blooming or avoid applications to blooms where possible. (3) Prior to application, evaluate for potential phytotoxicity of all tank mixes with additives or other pesticide products. Additives, including spray adjuvants, are not necessary for use with A103.02. Crop oils, surfactants and fertilizer adjuvants have been shown to increase the likelihood of phytotoxicity and are not recommended with A103.02. If greenhouses are under high temperature conditions, use caution whenever including an additive with A103.02 because the injury potential is higher. Do not tank mix with products that contain a label prohibition against tank mixing. Apply the tank mix to a small area (8 to 12 plants) and evaluate for 3 to 5 days before attempting a large-scale spray to make certain that no phytotoxicity occurs.

#### A103.02 Application Rates and Comments Greenhouse Grown Ornamentals

Target Pests	Rate (fl ozs/ 100 gals)	Rate (lbs ai/100 gals)	Comments
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Citrus budmite ( <i>Eriophyes sheldoni</i> ) Cyclamen mite ( <i>Phytonemus pallidus</i> ) Rust mite ( <i>Phyllocoptruta</i> spp., <i>Epitrimerus</i> spp. and <i>Aculus</i> spp.) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.)	2.6 to 5.2	0.04 to 0.08	<p>Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when mites first appear, before crop damage occurs.</p> <p>Use A103.02 at 2.6 to 5.2 fl oz/100 gallons for 14 to 21 day control of low to moderate populations of mites.</p> <p>Against high mite populations, or a generally high infestation across multiple crops in the same greenhouse, apply A103.02 at 5.2 fl ozs/100 gallons. Make a sequential application at 5 to 7 days after the first application to maintain control. Make only one sequential application.</p> <p>A103.02 is not systemic and does not translocate throughout the plant, but it is translaminar and moves rapidly from the top to the underside of a leaf to control mites.</p> <p>A103.02 will be diluted in rapidly expanding, new foliage as compared to the concentration in the leaf surface at the time of application. The sequential application mentioned above is important to maintain control.</p>

**A103.02 Application Rates and Comments  
Greenhouse Grown Ornamentals**

<b>Target Pests</b>	<b>Rate (fl ozs/ 100 gals)</b>	<b>Rate (lbs ai/100 gals)</b>	<b>Comments</b>
<b>Worms:</b> Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Soybean looper ( <i>Pseudoplusia includes</i> )	2.6 to 6.4	0.04 to 0.10	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when worms first appear, before crop damage occurs.
Foliar nematodes ( <i>Aphelenchoides</i> spp.)	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage.  Apply an initial application at 5.2 fl ozs /100 gallons when first signs of plant damage or nematodes are observed, followed by a second application at 5.2 fl ozs/100 gallons 7 to 14 days later.  A third application at 5.2 fl ozs/100 gallons can be made at 4 to 6 weeks after the initial application if plant damage or nematodes are detected.  To improve nematode control, add an IGR (insect growth regulator) or second MOA (Mode of Action) product registered for this use as a tank mixture.
Fungus gnats ( <i>Bradysia</i> spp.)	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when fungus gnats are in the early larval stage.  A103.02 will not control emerged adults, therefore, add an IGR or second MOA product registered for this use as a tank mixture.
<b>Thrips:</b> Chilli thrips ( <i>Scirtothrips dorsalis</i> Hood) Western flower thrips ( <i>Frankliniella occidentalis</i> )	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage.  Apply when thrips are immature and when populations are building, before crop damage occurs.  Western flower thrips are difficult to control because they may be concealed in blooms. Combinations with other effective insecticides will enhance overall control.  Alternation with other MOA products such as <b>Overture® 35 WP</b> insecticide or <b>Mesuro® 75-W</b> can help prevent resistance development. Incorporate an IGR such as <b>Pedestal®</b> novaluron insecticide in your spray program.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

#### Pesticide Storage

Keep A103.02 in its tightly closed original container, when not in use. Do not store below 32° F. Do not store in direct sunlight. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

#### Pesticide Disposal

Wastes resulting from the use of A103.02 may be disposed of on-site or at an approved waste disposal facility.

#### Container Disposal

**Nonrefillable Container:** Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying (see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity  $\leq 5$  gallons) as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container  $\frac{1}{4}$  full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and contain the spill with inert material (sand, earth, etc.) and transfer liquid and solid diking material to separate containers for disposal. Keep the spill out of all sewers and open bodies of water.

### LIMITATION OF WARRANTY AND LIABILITY

**IMPORTANT: READ BEFORE USE.** Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of ATTICUS, LLC. All such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** To the extent consistent with applicable law, ATTICUS, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

**LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, neither ATTICUS, LLC the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent

with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

Mesuroi is a registered trademark of Bayer AG, Germany

Overture is a registered trademark of Valent U.S.A. Corporation

Pedestal is a registered trademark of Makhteshim Agan of North America.

**{LANGUAGE ON LABEL AFFIXED TO CONTAINER}**

**A103.02**

**For Use Only On Fruiting Vegetables and Ornamental Crops Grown in Commercial Greenhouses**

**Active Ingredient:**

(% by weight)

Chlorfenapyr\*: ..... 21.4%  
Other Ingredients ..... 78.6%  
Total ..... 100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile  
Contains 2.0 pounds of active ingredient per gallon.

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

**Precautionary Statements**

**Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin. Causes moderate eye irritation. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

**STORAGE AND DISPOSAL**

**Do not** contaminate water, food or feed by storage or disposal.

**Pesticide Storage**

Keep A103.02 in its tightly closed original container, when not in use. **Do not** store below 32° F. **Do not** store in direct sunlight. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

**Pesticide Disposal**

Wastes resulting from the use of A103.02 may be disposed of on-site or at an approved waste disposal facility.

**Container Disposal**

**Nonrefillable Container:** **Do not reuse or refill this container.** Triple rinse or pressure rinse container (or equivalent) promptly after emptying (see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons) as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and contain the spill with inert material (sand, earth, etc.) and transfer liquid and solid diking material to separate containers for disposal. Keep the spill out of all sewers and open bodies of water.

See label booklet for First Aid, additional Precautionary Statements and Directions for Use.

**Manufactured For:**

Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

**EPA Reg. No.: 91234-XX**

**EPA Est. No.:**

**Net Contents:**

---

**T** Number: 1 Author: rgebken Subject: Highlight Date: 11/3/2016 12:39:33 PM

Identify as a "note to the reviewer" that the label booklet shall be securely attached to the immediate container. Refer to 40 CFR 156.10 (A)(4).

---

**T** Number: 2 Author: rgebken Subject: Cross-Out Date: 11/3/2016 12:34:04 PM

replace active ingredient with "Chlorfenapyr"





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

FEE

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION (7505P)

DOCUMENT CONTAINS CONFIDENTIAL INFORMATION

DP BAR CODE NO.: 434934  
PC Code: 129093  
FOOD Use: Yes

EPA File Symbol NO.: 91234-RO  
ACTION CODE: R301

DECISION NO.: 518428

DATE OUT: August 3, 2016

SUBJECT: End Use Product Chemistry Review  
Product Name: A103.02

FROM: Hari Mukhoty, DVM, PhD.  
Product Chemistry Team  
CITAB / Registration Division (7505P)

*Handwritten signatures and date:*  
SRM 8/17/16

TO: Carmen Rodia, RMR / Richard Gebken, RM 10  
Invertebrate & vertebrate Branch 2 / Registration Division (7505P)

Company Name: Atticus, LLC.

INTRODUCTION:

The registrant has submitted a basic CSF (Dated: 05/26/2016) for registration of the aforesaid product under EPA File Symbol: 91234-RO. Product chemistry data have been submitted under MRIDs: 499261-01 through -03.

The aforesaid product was manufactured by the [REDACTED]

CITAB has been requested to evaluate the product chemistry data required for registration of the aforesaid product.

SUMMARY OF FINDINGS:

1. Name of Active Ingredient(s): Chlorfenapyr (21.40%).
2. Has the registrant claimed substantial similarity to registered product?  
[ X ] Yes [ ] No [ ] NA If yes: EPA Reg. No. 241-374
3. The source materials of the active ingredients are registered with the Agency [Yes].
4. The CSFs have been screened by inert group and they found that inerts are approved for food use.

DP BAR CODE NO.: 434934  
PC Code: 129093  
FOOD Use: Yes

EPA File Symbol NO.: 91234-RO  
ACTION CODE: R301

DECISION NO.: 518428

5. Confidential Statement of Formula(s):

☒ Basic - Dated: 05/26/2016 Re-submitted: NA  
☐ Alternate - Dated: Re-submitted: NA

Alternate CSF(s) complies with 40CFR §152.43: ☒ Yes ☐ No NA ☐

6. Product label

a. Ingredient statement: Nominal concentrations of AI listed on CSF(s) concur with product label (PR Notice 91-2).

☒ Yes

Is the sub statement in compliance with PR Notice 97-6?

☒ Yes ☐ No - Uses the term "Other Ingredients"

, if not, explain below:

Metallic equivalent: ☐ Yes ☒ NA  
Soluble arsenic: ☐ Yes ☒ NA  
Isomeric ratios: ☐ Yes ☒ NA  
Acid equivalent: ☐ Yes ☒ NA

b. Health related sub statements:

Petroleum distillate at > 10%: ☐ Yes ☐ No ☒ NA  
Methanol at > 4%: ☐ Yes ☐ No ☒ NA  
Sodium Nitrate / Sodium Nitrite ☐ Yes ☐ No ☒ NA

c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☐ Yes ☒ No

Total Release Fogger PR Notice 98-6 (40 CFR 156.78 d): ☐ Yes ☒ No ☐ NA

d. Label requires an additional Storage and Disposal statement: ☐ Yes ☒ No

Final decision of overall label acceptance will be made by the PM.

DP BAR CODE NO.: 434934  
 PC Code: 129093  
 FOOD Use: Yes

EPA File Symbol NO.: 91234-RO  
 ACTION CODE: R301

DECISION NO.: 518428

7. Group A: Product Chemistry Data

CITAB's determination of the acceptability of the data for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		CITAB's Assessment of Data	MRID Nos.
			Yes	No		
830.1550	Product Identity & Composition		X		A	499261-01
830.1600	Description of materials used to produce the product		X		A	"
830.1650	Description of formulation process		X		A	"
830.1670	Discussion on the formation of impurities		X		A	"
830.1700	Preliminary analysis			NR	NR	
830.1750	Certified limits (158.350)	Standard certified limits	X		A	499261-01 / See CSF dated 05/26/2016 / CLs are standard
		Proposed Limits				
		Justification for wider limits				
830.1800	Enforcement analytical method #		X		Upgradable	499261-01

A = Acceptance, NR = Not Required, G = Data Gap,

W = Waiver Request, I = In Progress, NA = Not Acceptable

# Analytical Method: LC method detection is performed at 297 nm. Validation data have not been submitted for accuracy, precision and linearity (MRID: 499261-01 / Page 12).

DP BAR CODE NO.: 434934  
 PC Code: 129093  
 FOOD Use: Yes

EPA File Symbol NO.: 91234-RO  
 ACTION CODE: R301

DECISION NO.: 518428

8. Group B:

Guideline No.	Study Title	Value or Qualitative Description	CITAB's Assessment of Data	MRID Nos.
830.6303	Physical State	Liquid	A	499261-02
830.6314	Oxidation/reduction	Change in color with Iron powder @ 24 hours and in 1 minute with 5% potassium Permanganate & also @ 24 hours. Increase in temp of 6°C over 24 hrs only with 5% Potassium Permanganate.	A	"
830.6315	Flammability	> 230 °F	A	"
830.6316	Explodability	Not considered potentially explosive.	A	499261-03
830.6317	Storage stability	In Progress	I	"
830.6310	Miscibility	Petroleum solvent not used / not to be emulsified	A	"
830.6320	Corrosion characteristics	In Progress	I	"
830.7000	pH	5.86	A	499261-02
830.7100	Viscosity	Changes with motor speed. At 25°C ranges from 359 to 30560 centipoise / at 40°C ranges from 334 to 29520 centipoise with varying shear rate.	A	"
830.7300	Density	1.10 g/cm <sup>3</sup>	A	"
830.7520	Particle size	NA / Product does not contain particles or fibres	NA	

A = Acceptable, N = Not Acceptable, G = Data Gap, W = Waiver request, NA = Not applicable,  
 I = In progress

DP BAR CODE NO.: 434934  
PC Code: 129093  
FOOD Use: Yes

EPA File Symbol NO.: 91234-RO  
ACTION CODE: R301

DECISION NO.: 518428

**CONCLUSIONS:**

CITAB has reviewed the product chemistry data submitted/cited for the end-use product and has concluded that:

**A. Substantial similarity to the cited product (Reg. No. 241-374 Dated 04/29/2003) from Product chemistry view point**

- ☒ Similar
- ☐ Not similar, give reasons
- ☐ Identical
- ☐ Not identical
- ☐ Not applicable

**B. Confidential Statement of formula**

1. Basic CSF (dated: 05/26/2016)

- ☒ Acceptable
- ☐ Not Acceptable
- ☐ Not Applicable

If not acceptable provide the reasons

2. Alternate CSF (dated: )

- ☐ Acceptable -
- ☐ Not Acceptable -
- ☒ Not Applicable

If not acceptable give reasons

**C. Group A Product Chemistry Data**

- ☐ Acceptable
- ☐ Not acceptable
- ☒ Acceptable with the exception of Guideline(s): (830.1800 / No method validation data have been provided for analytical method used)
- ☐ Not required
- ☐ Data cited

**D. Group B Product chemistry data**

- ☐ Acceptable
- ☐ Not acceptable
- ☒ Acceptable with the exception of Guideline(s): (Storage stability 830.6317 & Corrosion Characteristics 830.6320 / In progress)
- ☐ Not required
- ☐ Data cited

**E. Product Label/Draft Label**

Recommendations – Yes ☒; No ☐ The product is incompatible with oxidizing agents

If yes, give recommendations below: "Do not mix or allow coming in contact with oxidizing agent. Hazardous Chemical reaction may occur".



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION (7505P)

DPBAR CODE NO.: 434934    EPA File Symbol NO.: 91234-RO    PRODUCT NAME: A103.02  
DECISION NO.: 518428    PC Code: 129093    ACTION CODE: R301  
FOOD Use: Yes

DATE OUT: August 3, 2016

SUBJECT: End Use Product Chemistry Review  
Product Name: A 103.02

FROM: Hari Mukhoty  
Product Chemistry Team  
Technical Review Branch / Registration Division (7505P)

TO: Carmen Rodia, CRM / Richard Gebken, PM - 10  
Invertebrate & Vertebrate Branch 2 / Registration Division (7505P)

Company Name: Atticus, LLC.  
Active Ingredient(s):

MRID No(s): 499261-01 through -03

**CONCLUSIONS:**

**Deficiencies:**

(If there are deficiencies they are indicated below each heading as Note 1, Note 2 Etc).

**Group A:** All required data submitted except validation data

**Group B:** All required data submitted / Storage stability / Corrosion characteristics are in progress

**CSF:** Basic CSF (dated: May 26, 2016) submitted.  
Note To Whom It May Concern: Certified Limits are Standard)

**Draft Product Label:** Submitted

Note to PM: If the deficiencies are found in the screen results, please inform the registrant and bring back to author of the report the correct deficiencies in response to 10 day letter. The corrected information will be attached to the original been, if the data package is still in the CITAB. New Bean is required in case the Bean has been closed by CITAB. Thank you.

**Rodia, Carmen**

---

**From:** Peters, Anthia  
**Sent:** Wednesday, July 27, 2016 3:57 PM  
**To:** Rodia, Carmen  
**Cc:** OPP Docket  
**Subject:** Docket established EPA-HQ-OPP-2016-0452 Chlorfenapyr; Pesticide Tolerances  
**Attachments:** Docket\_Metadata-EPA-HQ-OPP-2016-0452-07\_27\_2016-03\_56\_PM.pdf



## Docket Details

**Title:** Chlorfenapyr; Pesticide Tolerances ⓘ

**Short Title:** ⓘ

**Description:** ⓘ

**Type:** Nonrulemaking ⓘ

**Subtype:** ⓘ

**Location:** HQ-OPP ⓘ

**Pre-EDOCKET ID:** ⓘ

**Keyword(s):** ⓘ

**POC Instructions:**

**Legacy ID Number:**

**Old RIN data:**

**Notes:**





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND  
POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION

05/JULY/2016

SIMILARITY CLINIC MEMORANDUM

Subject: Name of Pesticide Product: A103.02  
EPA Reg. No. /File Symbol: 91234-RO  
DP Barcode: D434471  
Decision No: 518428  
Action Code: R301  
PC Code: 129093 (chlorfenapyr)

From: Eugenia McAndrew, Biologist *Eugenia McAndrew*

Through: John C. Redden, M.S., Senior Risk Assessor *JCR*  
Chemistry, Inerts and Toxicology Assessment Branch  
Registration Division (7505P)

To: Richard Gebken, Risk Manager Team 10  
Invertebrate and Vertebrate Branch 2  
Registration Division (7505P)

Applicant: Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Chlorfenapyr	22.6
Other ingredients:	<u>77.4</u>
Total:	100.0

**ACTION REQUESTED:** Similarity determination for 91234-RO, proposed product, and 241-374, cited product.

**BACKGROUND:** Atticus, LLC has applied for registration of A103.02, EPA File Symbol 91234-RO, claiming to be substantially similar to Pylon, EPA Reg. No. 241-374. Both products contain 21.4% chlorfenapyr. The submission includes a basic CSF dated May 26, 2016, label, data matrix and company letter.

The registrant is using the selective method of data support to satisfy the acute toxicity data requirements. The data matrix cites acute toxicity studies as follows: acute oral (MRID 43268204), acute dermal (MRID 43268205), acute inhalation (44763501), primary eye irritation (MRID 43268206), primary skin irritation (MRID 43268207) and dermal sensitization (MRID 42770218). A search of the OPP electronic databases shows that five of these studies were reviewed by the Health Effects Division for an experimental use permit for chlorfenapyr in 1994 (G. Reddy; D204626; AC 303, 630 and 2 SC Insecticide Miticide; TXR 011245; 27/SEPT/1994). The acute oral, acute dermal, primary eye irritation and primary skin irritation studies were conducted on 21.24% chlorfenapyr. The dermal sensitization study was conducted on 32% chlorfenapyr. The acute inhalation study (MRID 44763501) was submitted for EPA Reg. No. 241-392 and it was conducted on 21.88% chlorfenapyr. It was reviewed and classified as acceptable in a 1999 Technical Review Branch memo (B. Backus; D255726; EPA File Symbol 241-GOE; 21/MAY/1999).

#### **RECOMMENDATIONS:**

1. We compared the basic CSFs and labels of the proposed product, 91234-RO, and the cited product, 241-374, and determined that the two products are substantially similar. The cited acute toxicity data may be used to support this registration.

2. The acute toxicity profile for the proposed product, A103.02, EPA File Symbol 91234-RO, is as follows:

acute oral toxicity	III	cited	MRID 43268204
acute dermal toxicity	III	cited	MRID 43268205
acute inhalation toxicity	III	cited	MRID 44763501
primary eye irritation	IV*	cited	MRID 43268206
primary skin irritation	IV	cited	MRID 43268207
dermal sensitization	neg.	cited	MRID 42770218

\* We note that the acute toxicity profile for 91234-RO differs slightly from the cited product, 241-374. The label for 241-374 has precautionary and first said statements indicating Toxicity Category III for primary eye irritation. We recommend that the label for the proposed product use these statements for eye irritation though the cited study shows Toxicity Category IV.

3. The proposed basic CSF submitted for 91234-RO must be reviewed and accepted by the product chemists in the Chemistry, Inerts and Toxicology Assessment Branch.

**LABELING:** The following are the precautionary and first aid statements for this product as obtained from the Label Review System:

**PRODUCT ID #:** 091234-00019

**PRODUCT NAME:** A103.02

**PRECAUTIONARY STATEMENTS**

**SIGNAL WORD:** CAUTION

**Hazards to Humans and Domestic Animals:**

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Wear protective eyewear, if appropriate. Wear: Long-sleeved shirt and long pants, socks, shoes, and waterproof gloves.

**First Aid:**

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If inhaled:

- Move the person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for further treatment advice.

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

**User Safety Recommendations:**

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change clothing.

Decision Seq: 518428

Action Code: R301,NEW PRODUCT;IDENTICAL OR SUBSTANTIALLY SIMILA ...

FFS Start Date: 07-Jul-2016

Tentative Ind: No

Start/Stop Clock

FQPA Clock:

Due Date: 07-Nov-2016

75-Day Due Date:

Days Elapsed:

OPP Target Due Date:

21-Day Due Date: 07-Jul-2016

FFS Original Decision: ...

Negotiated Due Date:

45-Day Due Date: 22-Aug-2016

Registrant

Predecisional

Due Date: 24-Oct-2016

Add to Bundle? ☒

Response Due Date:

Due Date:

Current Status: PENDING (16-Jun-2016)

Bundle ID:

Decision Status

Tracking

Create Resubmission

FFS Letters

Waiver Documentation

Action Code History

Secondary Decision

Decision Bundle

75 Day Letters

45/90 Day Screen

Primary Decisions

Decision Milestone

FFS Negotiated Due Dates

12 OPP Target Due Date

Decision Comments

Payment

Unmatched Payments

Decision Ownership

Receipts

Data Package

Reduced Risk

Meetings &amp; Milestones

FFS Information

Receipts

Staff Member

Reg/DCI Number

Submission Due Dt

Response

S: 987841

Rodia, Carmen

91234-RO

07-Nov-2016

PENDING

Initial application for registration of new chlorfenapyr product.

**Memorandum****E-SUBMISSION**Date: 6 / 20 / 16To: PM 10, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

**We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.**

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission  
☐ partially accepted submission  
☐ rejected submission



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

June 20, 2016

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

PYXIS REGULATORY CONSULTING, INC.  
ATTICUS, LLC.  
4110 136TH STREET CT NW  
GIG HARBOR , WA 98332-9122

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 15-JUN-16. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. Ct. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
Email: Nicole@PyxisRC.com

June 15, 2016

MRID 499261-00

ELECTRONIC SUBMISSION

Richard Gebken (PM 10)  
Document Processing Desk (REGFEE)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

RE: Atticus, LLC – A103.02 (EPA Reg. No. 91234- )  
Application for New Pesticide Registration

Dear Mr. Gebken,

On behalf of Atticus, LLC please find the enclosed application for registration of A103.02, an end-use product containing chlorfenapyr as the active ingredient. In support of this application, we submit the following documents:

1. Application for Registration (EPA Form 8570-1)
2. Receipt of PRIA pre-payment from pay.gov
3. Confidential Statement of Formula (Basic Formulation dated May 26, 2016)
4. Formulators Exemption Statement (EPA Form 8570-27)
5. One (1) copy of the proposed labeling
6. Certification with Respect to Citation of Data (EPA Form 8570-34)
7. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
8. Public File Copy of the Data Matrix (EPA Form 8570-35)
9. Letter of Authorization from Atticus, LLC
10. Product Specific Data:

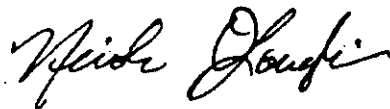
MRID	Guideline	Report Title
49926101	830.1550, 830.1600, 830.1650, 830.1670, 830.1750, 830.1800	O'Loughlin, N. Product Identity and Composition, Description of the Materials Used, Description of the Formulation Process, Discussion of the Formation of Impurities, Certified Limits, and Analytical Methods to Verify Certified Limits for A103.02.
49926102	830.6302, 830.6303, 830.6304, 830.6314, 830.6315, 830.7000, 830.7100, 830.7300	Theus, S. Final Report for: Physical and Chemical Characteristics of A103.02.
49926103	830.6313, 830.6316, 830.6317, 830.6319, 830.6320, 830.6321, 830.7050, 830.7200, 830.7220, 830.7370, 830.7520, 830.7550- 830.7570, 830.7840- 830.7860, 830.7950	O'Loughlin, N. Waiver Request for Certain Data Requirements for A103.02.



Atticus, LLC believes its product, A103.02, is substantially similar to a currently registered product (EPA Reg. No. 241-374) and this application falls under Category R301 (45) since A103.02 is a new product, substantially similar in composition and use to a registered product, only product chemistry data are being submitted to support the application for registration and the selective method is being used to support product specific acute toxicity data requirements. In addition, the technical source of active ingredient is based on a registered source of supply and therefore, A103.02 qualifies for Formulators Exemption for chlorfenapyr generic data requirements.

We trust you will find this application complete and in compliance with the requirements for registration under FIFRA. Please feel free to contact me (T) 253-853-7369 or (E) [Nicole@PyxisRC.com](mailto:Nicole@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole O'Loughlin", written in a cursive style.

Nicole O'Loughlin

Enclosures

**21-Day Screen Completed by**  
**Contractor**

Waiting for  
data  
6/21  
Kmy

**21-Day Expires on** 7-6-16

**Jacket #** 91234-RO  
**MRID#** 499261

**Content Screen:** Recommend to Pass/Fail

**11-3 Review:** Pass/Fail/NA

**Overall Status:** Recommend to Pass/Fail

**Transfer This Jacket to:**

STEPHEN SCHAIBLE

# PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 6-15-16

Experts In-Processing Signature: B.B.

Date 6-16-16

Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date \_\_\_\_\_

EPA Reg. Number: <u>91234-R0</u>		EPA Receipt Date: <u>6-15-16</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
		X				
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
		X				
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)			X		
7	Is the data package consistent with PR Notice 86-5			X		
8	Notice of Filing included with petitions					X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			X
10	<u>Required Data</u> and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

Comments:

Documentation: Pass  
 - Required forms are complete

Inerts: Pass  
 - Inerts approved for food use, pre harvest application to growing crops.

PRN 11-3: Pass

MRID- 499261

Ans 06/20/16 Overall Status: Pass

\* N/A – Not Applicable

#### Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

### **Unapproved Inerts Identified on CSFs**

#### **All applications except conventional new products and PIPs**

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

#### **Conventional New Product Applications**

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

#### PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

## R 300 and 301

100% identical (repack): YES or NO (circle one)

{If **yes**, it's a 100% repack - then product chemistry, acute toxicity and efficacy data are not required}

Data on Group A and B must be submitted - Group A and B can not be cited.

Guideline No.	Group A: Product Chemistry Data Study Title	Data submitted	
		Yes	No
830.1550	Product Identity & Composition	✓	
830.1600	Description of materials used to produce the product	✓	
830.1650	Description of formulation process	✓	
830.1670	Discussion on the formation of impurities	✓	
830.1700	Preliminary analysis	✓	
830.1750	Certified limits (158.345)	✓	
830.1800	Enforcement analytical method	✓	

Guideline No.	Group B: Product Chemistry Data Study Title	Data submitted	
		Yes	No
830.6302	Color	✓	
830.6303	Physical State	✓	
830.6304	Odor	✓	
830.6314	Oxidation/Reduction (Chemical incompatibility)	✓	
830.6315	Flammability	✓	
830.6316	Explosibility	✓	
830.6317	Storage stability	✓	
830.6319	Miscibility	✓	
830.6320	Corrosion Characteristics	✓	
830.6321	Dielectric Breakdown voltage	✓	
830.7000	pH	✓	
830.7100	Viscosity	✓	
830.7300	Density	✓	



## R 300 and 301

New products must provide a bridging rationale document. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

Guideline No.	Acute toxicity (6 pack) Study Title	Cited	
		Yes	No
870.1100	Acute Oral (LD50)	✓	
870.1200	Acute Dermal (LD50)	✓	
870.1300	Acute Inhalation (LC50)	✓	
870.2400	Acute Eye Irritation	✓	
870.2500	Acute Dermal Irritation	✓	
870.2600	Dermal Sensitization	✓	

Efficacy – which guideline depends on the proposed label use and they must cite the data to be used for the bridging rationale.

Guideline No.	Efficacy Study Titles	Cited		Comments
		Yes	No	
810.3100	Soil Treatments for Imported Fire Ants			N/A
810.3200	Livestock, Poultry, Fur and Wool-Bearing Animal Treatments			N/A
810.3300	Treatments to Control Pests of Humans and Pets			N/A
810.3400	Mosquito, Black Fly, and Biting Midge (Sand Fly) Treatments			N/A
810.3500	Premises Treatments			N/A
810.3600	Structural Treatments			N/A
810.3800	Methods for Efficacy Testing of Termite Baits			N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

June 16, 2016

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OPP Decision Number: D-518428  
EPA File Symbol or Registration Number: 91234-RO  
Product Name: A103.02  
EPA Receipt Date: 15-Jun-2016  
EPA Company Number: 91234  
Company Name: ATTICUS, LLC.

NICOLE O'LOUGHLIN  
AGENT FOR: ATTICUS, LLC  
PYXIS REGULATORY CONSULTING INC.  
4110 136TH ST CT NW  
GIG HARBOR, WA 98332

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R301  
NEW PRODUCT; IDENTICAL OR SUBSTANTIALLY SIMILAR IN COMPOSITION AND  
USE TO A REGISTERED PRODUCT; REGISTERED SOURCE OF ACTIVE  
INGREDIENT; SELECTIVE DATA CITATION ONLY FOR DATA ON PRODUCT  
CHEMISTRY / ACUTE TOXICITY / PUBLIC HEALTH PEST EFFICACY, WHERE  
APPLICANT DOES NOT OWN ALL REQUIRED DATA NOR HAS AUTHORIZATION  
LETTER FROM DATA OWNER;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee  
Ombudsman at (703) 308-9362.

Sincerely,

Front End Processing Staff

Information Technology & Resources Management Division

**Fee for Service**

W  
{987841<~

This package includes the following

- ☒ New Registration
- ☐ Amendment

☒ Studies?      ☐ Fee Waiver?

☐ volpay    % Reduction: \_\_\_\_

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr.    10

Receipt No.

S-

987841

EPA File Symbol/Reg. No.

91234-RO

Pin-Punch Date:

6/15/2016

☐ This item is NOT subject to FFS action.

Action Code:

Requested: R301

Granted: R301

Amount Due: \$ 1897

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: L. Patel

Date: 6/16/16

Remarks:

Sim clinic

**DOCUMENTUM**

Receipt for Section 3

S: 987841

Milestone Email: Nicole@PyxisRC.com

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: New Registration

Fee For Service: ☐ Yes ☒ No

Billable: ☐ Yes ☒ No

Company: 91234 ATTICUS, LLC



Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division, Risk Management Team 10

Product #: 91234-RO

Product Name: A103.02

Override#:

Me Too  
Section3: 241-374

Me Too Product  
Name: PYLON MITICIDE-INSECTICIDE

Application Date: 15-Jun-2016

OPP Rec'd Date: 15-Jun-2016

Front End Date: 15-Jun-2016

Risk Manager Send Date:

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Portal submission pkg. #12229. New product registration.

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content

Study

CSF

View/Edit

DOCUMENTUM



## Receipt

### Your payment is complete

Pay.gov Tracking ID: 25S746EG

Agency Tracking ID: 75035237953

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

### Payment Information

Payment Type: Debit or credit card

Payment Amount: \$1,897.00

Transaction Date: 06/15/2016 02:18:43 PM EDT

Payment Date: 06/15/2016

Registration Number:

Company Name: Atticus, LLC

Company Number: 91234

Action Code: R301

### Account Information

Cardholder Name: Kerrie Fersch

Card Type: Master Card

Card Number: \*\*\*\*\*3548


### Email Confirmation Receipt

Confirmation Receipts have been emailed to:

Nicole@PyxisRC.com

kerrie.fersch@cseilifescience.com

**DOCUMENTUM**

 <b>Environmental Protection Agency</b> United States Washington, DC 20460	<input checked="" type="checkbox"/> <b>Registration</b> <input type="checkbox"/> <b>Amendment</b> <input type="checkbox"/> <b>Other</b>	OPP Identifier Number

**Application for Pesticide – Section I**

1. Company/Product Number 91234-	2. EPA Product Manager R. Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Atticus, LLC / A103.02	PM# 10	
5. Name and Address of Applicant (include ZIP Code) Atticus, LLC c/o Pyxis Regulatory Consulting Inc. 4110 136 <sup>th</sup> St. Ct. NW Gig Harbor, WA 98332	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>241-374</u> Product Name <u>Pylon Miticide-Insecticide</u>	

**Section - II**

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below.

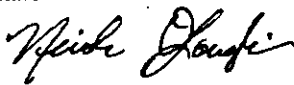
**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

This application falls under Category R301 (45) as it is a new product substantially similar in composition and use to a registered product, only product chemistry data are being submitted and the selective method is being used to support product specific acute toxicity data requirements. The fee due is \$1,897.00 and the decision timeline is 4 months. A receipt of PRIA pre-payment from pay.gov is included with this application. Should you have any questions, please contact me at (email) Nicole@PyxisRC.com or (phone) 253-853-7369.

**Section - III**

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
<b>* Certification must be submitted</b>		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 qt.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Nicole O'Loughlin	Title Agent	Telephone No. (include Area Code) (253) 853-7369
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Nicole O'Loughlin	5. Date Jun. 15, 2016	

**PYXIS REGULATORY CONSULTING, INC.**

4110 136<sup>th</sup> St. Ct. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
Email: Nicole@PyxisRC.com

June 15, 2016

**MRID 499261-00**

**ELECTRONIC SUBMISSION**

Richard Gebken (PM 10)  
Document Processing Desk (**REGFEE**)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

RE: Atticus, LLC— A103.02 (EPA Reg. No. 91234- )  
Application for New Pesticide Registration

Dear Mr. Gebken,

On behalf of Atticus, LLC please find the enclosed application for registration of A103.02, an end-use product containing chlorfenapyr as the active ingredient. In support of this application, we submit the following documents:

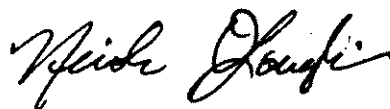
1. Application for Registration (EPA Form 8570-1)
2. Receipt of PRIA pre-payment from pay.gov
3. Confidential Statement of Formula (Basic Formulation dated May 26, 2016)
4. Formulators Exemption Statement (EPA Form 8570-27)
5. One (1) copy of the proposed labeling
6. Certification with Respect to Citation of Data (EPA Form 8570-34)
7. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
8. Public File Copy of the Data Matrix (EPA Form 8570-35)
9. Letter of Authorization from Atticus, LLC
10. Product Specific Data:

MRID	Guideline	Report Title
49926101	830.1550, 830.1600, 830.1650, 830.1670, 830.1750, 830.1800	O'Loughlin, N. Product Identity and Composition, Description of the Materials Used, Description of the Formulation Process, Discussion of the Formation of Impurities, Certified Limits, and Analytical Methods to Verify Certified Limits for A103.02.
49926102	830.6302, 830.6303, 830.6304, 830.6314, 830.6315, 830.7000, 830.7100, 830.7300	Theus, S. Final Report for: Physical and Chemical Characteristics of A103.02.
49926103	830.6313, 830.6316, 830.6317, 830.6319, 830.6320, 830.6321, 830.7050, 30.7200, 830.7220, 830.7370, 830.7520, 830.7550- 830.7570, 830.7840- 830.7860, 830.7950	O'Loughlin, N. Waiver Request for Certain Data Requirements for A103.02.

Atticus, LLC believes its product, A103.02, is substantially similar to a currently registered product (EPA Reg. No. 241-374) and this application falls under Category R301 (45) since A103.02 is a new product, substantially similar in composition and use to a registered product, only product chemistry data are being submitted to support the application for registration and the selective method is being used to support product specific acute toxicity data requirements. In addition, the technical source of active ingredient is based on a registered source of supply and therefore, A103.02 qualifies for Formulators Exemption for chlorfenapyr generic data requirements.

We trust you will find this application complete and in compliance with the requirements for registration under FIFRA. Please feel free to contact me (T) 253-853-7369 or (E) [Nicole@PyxisRC.com](mailto:Nicole@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nicole O'Loughlin".

Nicole O'Loughlin

Enclosures





January 5, 2016

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Janelle Kay, Mike Kellogg, Ann Tillman, Leanne Pruett, Maryanne Geisbush, Nicole O'Loughlin, and Nicki Purnell of Pyxis Regulatory Consulting, Inc. are authorized to act as agent for Atticus, LLC. (EPA Company Number 91234), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Brooke Hedrick'.

Brooke Hedrick  
Regulatory Manager & Project Management  
Atticus, LLC

cc: Pyxis Regulatory Consulting, Inc.

Environmental Protection Agency

### Formulator's Exemption Statement

**Applicant's Name and Address**

Atticus, LLC

501 Cascade Pointe Lane, Suite 102

Cary, NC 27513

EPA File Symbol/Registration Number

91234-

Product Name

A103.02

Date of Confidential Statement of Formula (EPA Form 8570-4)

May. 26, 2016

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

### Chlorfenapyr

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) of (3).

(3) Indicated by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statements. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

**OR**

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

### Source

### Active Ingredient

Product Name

Registration Number

## Chlorfenapyr

**Signature**

Heide Loupin

Name and Title

**Nicole O'Loughlin | Agent**

Date \_\_\_\_\_

Jun. 08, 2016

**\*Product ingredient source information may be entitled to confidential treatment\***



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**1200 Pennsylvania Avenue, N.W.**  
**WASHINGTON, D.C. 20460**

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the complete form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Atticus, LLC c/o Pyxis Regulatory Consulting, Inc.; 4110 136 <sup>th</sup> St Ct NW Gig Harbor, WA 98332, (253) 853-7369	EPA Registration Number/File Symbol/ 91234-
Active Ingredient(s) and/or representative test compound(s) Chlorfenapyr	Date Jun. 15, 2016
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Food/Nonfood	Product Name A103.02

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statements (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have including with this form a list of companies send offer of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT** (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (II) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date Jun. 15, 2016	Typed or Printed Name and Title Nicole O'Loughlin   Agent
---------------	-----------------------	--


## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

## DATA MATRIX

Date June 15, 2016			EPA Reg. No./File Symbol 91234-xx		Page 1 of 5
Applicant's / Registrant's Name & Address Atticus, LLC 501 Cascade Point Lane, Suite 102 Cary, NC 27513			Product A103.02		
Ingredient Chlorfenapyr (CAS No. 122453-73-0)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	49926101	Atticus, LLC	OWN	
830.1600	Description of Materials Used to Produce the Product	49926101	Atticus, LLC	OWN	
830.1620	Description of Production Process				Not required <sup>1</sup>
830.1650	Description of Formulation Process	49926101	Atticus, LLC	OWN	
830.1670	Discussion of Formation of Impurities	49926101	Atticus, LLC	OWN	
830.1700	Preliminary Analysis				Not required <sup>2</sup>
830.1750	Certified Limits	49926101	Atticus, LLC	OWN	
830.1800	Enforcement Analytical Method	49926101	Atticus, LLC	OWN	
830.6302	Color	49926102	Atticus, LLC	OWN	
830.6303	Physical State	49926102	Atticus, LLC	OWN	
830.6304	Odor	49926102	Atticus, LLC	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	49926103	Atticus, LLC	OWN	Not required <sup>3</sup>
830.6314	Oxidation/Reduction: Chemical Incompatibility	49926102	Atticus, LLC	OWN	
Signature 			Name and Title Nicole O'Loughlin, Consultant		Date June 15, 2016

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, D.C. 20460**

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date <b>June 15, 2016</b>			EPA Reg. No./File Symbol <b>91234-xx</b>	Page <b>2</b> of <b>5</b>	
Applicant's / Registrant's Name & Address  <div style="text-align: center;">Atticus, LLC  501 Cascade Point Lane, Suite 102  Cary, NC 27513</div>			Product  <b>A103.02</b>		
Ingredient <b>Chlorfenapyr (CAS No. 122453-73-0)</b>					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6315	Flammability	49926102	Atticus, LLC	OWN	
830.6316	Explosibility	49926103	Atticus, LLC	OWN	Not required <sup>4</sup>
830.6317	Storage Stability	49926103	Atticus, LLC	OWN	PRN 92-5 <sup>5</sup>
830.6319	Miscibility	49926103	Atticus, LLC	OWN	Not required <sup>6</sup>
830.6320	Corrosion Characteristics	49926103	Atticus, LLC	OWN	See endnote <sup>5</sup>
830.6321	Dielectric Breakdown Voltage	49926103	Atticus, LLC	OWN	Not required <sup>7</sup>
830.7000	pH	49926102	Atticus, LLC	OWN	
830.7050	UV/Visible Absorption	49926103	Atticus, LLC	OWN	Not required <sup>3</sup>
830.7100	Viscosity	49926102	Atticus, LLC	OWN	
830.7200	Melting Point/Melting Range	49926103	Atticus, LLC	OWN	Not required <sup>3</sup>
830.7220	Boiling Point/Boiling Range	49926103	Atticus, LLC	OWN	Not required <sup>3</sup>
830.7300	Density/Relative Density/Bulk Density	49926102	Atticus, LLC	OWN	
830.7370	Dissociation Constants in Water	49926103	Atticus, LLC	OWN	Not required <sup>3</sup>
830.7520	Particle size, fiber length, diameter distribution	49926103	Atticus, LLC	OWN	Not required <sup>8</sup>

Signature 	Name and Title Nicole O'Loughlin, Consultant	Date June 15, 2016
--	---	-----------------------

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, D.C. 20460**

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date <b>June 15, 2016</b>			EPA Reg. No./File Symbol <b>91234-xx</b>	Page <b>3</b> of <b>5</b>	
Applicant's / Registrant's Name & Address  <div style="text-align: center;">Atticus, LLC  501 Cascade Point Lane, Suite 102  Cary, NC 27513</div>			Product  <b>A103.02</b>		
Ingredient <b>Chlorfenapyr (CAS No. 122453-73-0)</b>					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	49926103	Atticus, LLC	OWN	Not required <sup>3</sup>
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method	49926103	Atticus, LLC	OWN	See 830.7550
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography	49926103	Atticus, LLC	OWN	See 830.7550
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	49926103	Atticus, LLC	OWN	Not required <sup>3</sup>
830.7860	Water Solubility, Generator Column Method	49926103	Atticus, LLC	OWN	Not required <sup>3</sup>
830.7950	Vapor Pressure	49926103	Atticus, LLC	OWN	Not required <sup>3</sup>
870.1100 (81-1)	Acute Oral Toxicity: Rat	43268204		OLD	
870.1200 (81-2)	Acute Dermal Toxicity: Rat	43268205		OLD	
870.1300 (81-3)	Acute Inhalation Toxicity: Rat	44763501		OLD	
870.2400 (81-4)	Primary Eye Irritation: Rabbit	43268206		OLD	
870.2500 (81-5)	Primary Dermal Irritation	43268207		OLD	

Signature 	Name and Title Nicole O'Loughlin, Consultant	Date June 15, 2016
--	---	-----------------------

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

## DATA MATRIX

Date June 15, 2016			EPA Reg. No./File Symbol 91234-xx		Page 4 of 5
Applicant's / Registrant's Name & Address Atticus, LLC 501 Cascade Point Lane, Suite 102 Cary, NC 27513			Product A103.02		
Ingredient Chlorfenapyr (CAS No. 122453-73-0)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.2600 (81-6)	Dermal Sensitization	42770218		OLD	
<b>Chlorfenapyr Generic Data Requirements</b>					
A103.02 qualifies for Formulator's Exemption for chlorfenapyr generic data requirements.					

Signature 	Name and Title Nicole O'Loughlin, Consultant	Date June 15, 2016
--	---	-----------------------

## Endnotes for Data Matrix for A103.02

- 
- <sup>1</sup> **830.1620** - Per OPPTS 830.1000, these data are not required for the registration of an end-use product. See 830.1650 for formulation process information.
- <sup>2</sup> **830.1700** – This product does not consist solely of the technical grade active ingredient (TGAi) and is not produced by an integrated system, therefore, per OPPTS 830.1700, these data are not required.
- <sup>3</sup> **830.6313, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550, 830.7560, 830.7570, 830.7840, 830.7860 and 830.7950** – Per OPPTS 830.1000, these data are not required for the registration of an end-use product.
- <sup>4</sup> **830.6316** – This product does not have explosive characteristics; therefore these data are not required. Please refer to the Confidential Statement of Formula for additional information on the composition of A103.02.
- <sup>5</sup> **830.6317, 830.6320 – Storage Stability and Corrosion Characteristics:** Atticus, LLC is currently conducting storage stability and corrosion characteristic studies to satisfy guidelines 830.6317 and 830.6320, respectively. Per PR Notice 92-5, storage stability data are not required to be submitted unless specifically requested by the Agency. OPPTS 830.6317 and 830.6320 guidelines allow the corrosion characteristics study and storage stability study to be conducted simultaneously. Atticus, LLC will submit these data upon completion. Atticus, LLC requests that a conditional registration for A103.02 be granted on the submission of these data.
- <sup>6</sup> **830.6319** – A103.02 is a soluble liquid and not an emulsifiable concentrate. In addition, the proposed labeling recommends dilution with water, not oil; therefore, these data are not required.
- <sup>7</sup> **830.6321** – This product is not proposed for use around electrical equipment. Therefore, these data are not applicable nor are these data required.
- <sup>8</sup> **830.7520** - These data are not required for A103.02 because it is not water insoluble and is not a fibrous material.



[Note to reviewer: [Text] in brackets denotes optional text.]

[Note to reviewer: {Text} in braces denotes where in the final label text will appear.]

## {BOOKLET FRONT PANEL LANGUAGE}

GROUP

13

INSECTICIDE

# A103.02

For Use Only On Fruiting Vegetables and Ornamental Crops Grown in Commercial Greenhouses

Active Ingredient:	(% by weight)
Chlorfenapyr*:	21.4%
Other Ingredients	78.6%
Total	100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-pyrrole-3-carbonitrile  
Contains 2.0 pounds of active ingredient per gallon.

## KEEP OUT OF REACH OF CHILDREN CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See inside label booklet for First Aid, Precautionary Statements and Directions for Use.

Manufactured For:  
Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

EPA Reg. No.: 91234-XX  
EPA Est. No.:

Net Contents:

## { LANGUAGE INSIDE BOOKLET }

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• <b>Do not</b> induce vomiting unless told to do so by the poison control center or doctor.</li><li>• <b>Do not</b> give anything by mouth to an unconscious person.</li></ul>
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
IF INHALED	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance; then give artificial respiration, preferably by mouth to mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
IF IN EYES	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>HOT LINE NUMBERS</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical assistance, call SafetyCall: <b>1-844-685-9173</b> . For chemical emergency: spill, leak, fire, exposure or accident, call CHEMTREC: <b>1-800-424-9300</b> .	

**For Chemical Emergency**  
**Spill, Leak, Fire, Exposure, or Accident**  
**Call CHEMTREC Day or Night**  
**Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)**

### Precautionary Statements

#### Hazards to Humans and Domestic Animals

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin. Causes moderate eye irritation. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

#### Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow instructions for **Category C** on an EPA chemical resistance category selection chart.

**Applicators and Other Handlers Must Wear:** (1) long-sleeved shirt and long pants; (2) chemical-resistant gloves, such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride (PVS), or Viton ( $\geq 14$  mils); (3) shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with the product's concentrate. **Do not** reuse them.

#### Engineering Controls Statement

When handlers use closed systems or enclosed cabs in a manner that meets the requirements of the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240 (d) (4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

**IMPORTANT:** When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for **applicators and other handlers** and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown.

#### USER SAFETY RECOMMENDATIONS

**Users should:** (1) Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. (2) Remove contaminated clothing/PPE immediately and then wash thoroughly and change into clean clothing. (3) Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### Environmental Hazards

This pesticide is toxic to aquatic organisms, birds, and wildlife. **Do not** apply directly to water or to areas where surface water is present. Avoid spraying ponds or aquaria containing fish. Runoff from treated areas may be hazardous to aquatic organisms in neighboring areas.

This product is toxic to bees exposed to direct treatment on blooming crops or weeds. **Do not** apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

**Do not** contaminate water by cleaning of equipment or when disposing of equipment washwaters or rinsate. **Do not** discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or regional office of the EPA. **Do not** discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge.

#### Physical or Chemical Hazards

**Do not** apply this product around electrical equipment due to the possibility of shock hazard.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation.

### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard (WPS), 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval.

**Do not** enter or allow worker entry into treated areas during the restricted entry interval (REI) of **12 hours**.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: (1) Coveralls; (2) Chemical-resistant gloves, such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride (PVC) or Viton ( $\geq 14$  mils); (3) Shoes plus socks.

### A103.02 USE RESTRICTIONS

- **Do not** apply A103.02 except as specified on this label.
- **Do not** apply A103.02 in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the treated area during application.
- **Do not** use A103.02 on any other crops except fruiting vegetable crops and ornamental crops grown in commercial greenhouses.
- **Do not** contaminate food or feedstuffs.
- **Do not** compost any discarded plant materials that have been treated with A103.02.
- **Do not** apply A103.02 through any type of irrigation system.
- **Do not** tank mix with products that contain a label prohibition against tank mixing.
- **Do not** apply more than three (3) applications of A103.02 during a crop growing cycle.
- **Do not** use A103.02 to formulate, reformulate or repackage into any other pesticide product without the written permission of Atticus, LLC.

### GENERAL INFORMATION

A103.02 is a broad-spectrum insecticide-miticide for use on greenhouse grown fruiting vegetables and greenhouse grown ornamentals. It has excellent stomach activity when ingested and good contact activity when pests come in contact with it. A103.02 is classified in a class of insecticides-miticides called Pyrroles. Members of this class of products have a similar mode of action that involves uncoupling oxidative phosphorylation and preventing conversion of ADP to ATP which affects energy metabolism so that mites and insects cannot generate enough energy to survive.

A103.02 does not have ovicidal activity. Therefore, it should be used in combination with a registered miticide or insecticide with ovicidal activity if moderate to heavy numbers of mite or insect eggs are present at application time.

**Resistance Management:** All crop protection chemicals should be used in resistance management programs suitable for the crop-pest complex involved. The program should involve different classes of chemistry in the control of the pests. For more information on insect resistance, contact the local Cooperative Extension Service.

When using A103.02 in greenhouses, do not apply more than two (2) consecutive applications before rotating to an insecticide-miticide with a different mode of action. In addition, do not apply A103.02 to consecutive crops in the greenhouse unless applied in combination with another insecticide-miticide with a different mode of action.

**Mixing Instructions:** Agitate or shake A103.02 containers prior to use in order to prepare a uniform spray solution. Add  $\frac{1}{2}$  to  $\frac{3}{4}$  of the required amount of clean water to the spray tank and start agitation. Measure the required amount of A103.02 with a calibrated measuring device and add to the spray tank while agitating. Add the rest of the water and continue with agitation. If preparing a tank-mixture, add A103.02 to the tank first and be sure that it is fully dispersed in water before adding the additional materials. To prevent waste and disposal of used spray solution, it is best to prepare no more spray solution than is needed for the immediate operation.

**Compatibility:** Although A103.02 is compatible with many spray products, a full range of compatibilities under all local conditions has not been evaluated. Therefore, the compatibility of any mixture with A103.02 must be determined using a jar test. Conduct a jar test by adding proportionate amounts of each ingredient of the tank-mixture to a pint or quart jar. Cap, shake, and let sit for at least 15 minutes. If a precipitate forms and it cannot be readily re-dispersed, do not use the mixture because it is incompatible.

**Tank Mixing:** As stated above, if using A103.02 in a tank-mixture, always add A103.02 to the spray tank first and make sure it is fully dispersed in water before adding any other tank-mix product. Follow all applicable directions, restrictions and precautions on the label for the tank mix partners. The most restrictive labeling applies when using a tank mix. **Do not tank mix with products that contain a label prohibition against tank mixing. It is unlawful to tank mix A103.02 if the tank mix will be used outdoors.**

#### **FRUITING VEGETABLE CROPS GROWN IN COMMERCIAL GREENHOUSES**

A103.02 is broad-spectrum and can be used to control insect and mite pests on greenhouse grown fruiting vegetables such as eggplant, groundcherry, pepino, pepper, tomatillo and tomato. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage. A103.02 can be applied up to and including the day of harvest.

#### **Use Restrictions for Greenhouse Fruiting Vegetables**

- Apply A103.02 according to the "A103.02 USE RESTRICTIONS" and "GENERAL INFORMATION" sections of this label.
- **Do not** apply A103.02 as an ultra low volume (ULV) spray.
- Do not use on tomato varieties with a mature fruit diameter of less than one (1) inch.
- Allow at least 5 to 7 days between applications.
- **Do not** apply more than 39 fl ozs of A103.02 (0.6 lb ai) per acre, per crop growing cycle in fruiting vegetables.
- It is unlawful to use a tank-mixture with A103.02 outdoors.

**A103.02 Application Rates and Comments**  
**Fruiting Vegetables Grown In Commercial Greenhouses**

**Eggplant, Ground cherry, Pepinos, Peppers, Tomatillo and Tomato**

Target Pests	Rate (fl ozs/A)	Rate (lbs ai/A)	Comments
<b>Worms:</b> Alfalfa looper ( <i>Autographa californica</i> ) Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Fall armyworm ( <i>S. frugiperda</i> ) Hornworms ( <i>Manduca quinquemaculata</i> ) Southern armyworm ( <i>S. eridania</i> ) Tobacco budworm ( <i>H. virescens</i> ) Tomato fruitworm ( <i>Heliothis zea</i> ) Tomato pinworm ( <i>Keiferia lycopersicella</i> ) Yellowstriped armyworm ( <i>S. omithogalli</i> )	6.5 to 13	0.10 to 0.20	Apply as required by scouting. Apply in a spray volume between 5 and 100 gallons per acre.  Repeat applications as needed (usually 5 to 10 days) for control, but allow at least 5-7 days between applications. Use a longer time interval when infestations are light to moderate; shorten the time interval for heavier infestations.
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.	6.5 to 13	0.10 to 0.20	Use lower rates when populations are at action thresholds and higher rates when populations are heavy and causing damage.
<b>Thrips:</b> Melon thrips ( <i>Thrips palmi</i> ) Onion thrips ( <i>Thrips tabaci</i> ) Western flower thrips ( <i>Frankliniella occidentalis</i> )	9.8 to 13	0.15 to 0.20	

**ORNAMENTAL CROPS GROWN IN COMMERCIAL GREENHOUSES**

On greenhouse ornamentals, A103.02 is broad-spectrum and controls mites, insects and foliar nematodes. If multiple pests are present, always use the rates required to control the most difficult pest. Use lower rates when populations are at action thresholds and higher rates when populations have reached economic injury levels for yield or quality.

**Application Instructions:** Always maintain agitation during application. Use the suggested dosage in sufficient water for thorough coverage of foliage.

**Use Restrictions for Greenhouse Ornamentals**

- Apply A103.02 according to the "A103.02 USE RESTRICTIONS" and "GENERAL INFORMATION" sections of this label.
- Do not apply more than 41 fl ozs of A103.02 per 100 gallons per crop per season or 0.64 lb of active ingredient per 100 gallons per crop per season in greenhouse ornamentals (start to finish for one ornamental crop).
- It is unlawful to use a tank-mixture with A103.02 outdoors.

**Crop Tolerance:** Although A103.02 has been shown to be safe to many ornamental species when used according to label use directions, not all ornamental plant species and cultivars have been tested for tolerance to A103.02, tank-mix combinations of A103.02, or pesticide treatments before or after those of A103.02. Also, since local conditions can influence plant tolerance, they may not match the conditions under which testing of A103.02 was conducted.

**Sensitive Ornamental Plant Species:** Some ornamental plant species have been found, under certain conditions, to be less tolerant to A103.02 when used according to label directions. Phytotoxicity is likely to occur if A103.02 is applied to the following ornamental plant species: Dianthus (*Dianthus* spp.) including carnations, pinks and Sweet William varieties, Kalanchoe (*Kalanchoe blossfeldiana*), Poinsettia (*Euphorbia*

*pulcherrima*), Roses (*Rosa* spp.), Salvia (*Salvia* spp.) and Zinnia (*Zinnia* spp.).

If application is made to these sensitive ornamental plant species it is made at grower risk.

**Follow these suggestions to reduce potential injury to ornamentals:** (1) Do not apply to plugs in their early stages of development (1 to 2 leaf) as injury to some tender crops could occur. If application to plugs is necessary, test A103.02 on a small number of plants before doing large scale treatments. (2) Apply A103.02 during the coolest parts of the day and always apply prior to blooming or avoid applications to blooms where possible. (3) Prior to application, evaluate for potential phytotoxicity of all tank mixes with additives or other pesticide products. Additives, including spray adjuvants, are not necessary for use with A103.02. Crop oils, surfactants and fertilizer adjuvants have been shown to increase the likelihood of phytotoxicity and are not recommended with A103.02. If greenhouses are under high temperature conditions, use caution whenever including an additive with A103.02 because the injury potential is higher. Do not tank mix with products that contain a label prohibition against tank mixing. Apply the tank mix to a small area (8 to 12 plants) and evaluate for 3 to 5 days before attempting a large-scale spray to make certain that no phytotoxicity occurs.

#### A103.02 Application Rates and Comments Greenhouse Grown Ornamentals

Target Pests	Rate (fl ozs/ 100 gals)	Rate (lbs ai/100 gals)	Comments
<b>Mites:</b> Broad mite ( <i>Polyphagotarsonemus latus</i> ) Citrus budmite ( <i>Eriophyes sheldoni</i> ) Cyclamen mite ( <i>Phytonemus pallidus</i> ) Rust mite ( <i>Phyllocoptruta</i> spp., <i>Epitrimerus</i> spp. and <i>Aculus</i> spp.) Two-spotted spider mite ( <i>Tetranychus urticae</i> and other <i>Tetranychus</i> spp.)	2.6 to 5.2	0.04 to 0.08	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when mites first appear, before crop damage occurs.  Use A103.02 at 2.6 to 5.2 fl oz/100 gallons for 14 to 21 day control of low to moderate populations of mites.  Against high mite populations, or a generally high infestation across multiple crops in the same greenhouse, apply A103.02 at 5.2 fl ozs/100 gallons. Make a sequential application at 5 to 7 days after the first application to maintain control. Make only one sequential application.  A103.02 is not systemic and does not translocate throughout the plant, but it is translaminar and moves rapidly from the top to the underside of a leaf to control mites.  A103.02 will be diluted in rapidly expanding, new foliage as compared to the concentration in the leaf surface at the time of application. The sequential application mentioned above is important to maintain control.

**A103.02 Application Rates and Comments  
Greenhouse Grown Ornamentals**

<b>Target Pests</b>	<b>Rate (fl ozs/ 100 gals)</b>	<b>Rate (lbs ai/100 gals)</b>	<b>Comments</b>
<b>Worms:</b> Beet armyworm ( <i>Spodoptera exigua</i> ) Cabbage looper ( <i>Trichoplusia ni</i> ) Soybean looper ( <i>Pseudoplusia includes</i> )	2.6 to 6.4	0.04 to 0.10	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when worms first appear, before crop damage occurs.
Foliar nematodes ( <i>Aphelenchoides</i> spp.)	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage.  Apply an initial application at 5.2 fl ozs /100 gallons when first signs of plant damage or nematodes are observed, followed by a second application at 5.2 fl ozs/100 gallons 7 to 14 days later.  A third application at 5.2 fl ozs/100 gallons can be made at 4 to 6 weeks after the initial application if plant damage or nematodes are detected.  To improve nematode control, add an IGR (insect growth regulator) or second MOA (Mode of Action) product registered for this use as a tank mixture.
Fungus gnats ( <i>Bradysis</i> spp.)	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage. Apply when fungus gnats are in the early larval stage.  A103.02 will not control emerged adults, therefore, add an IGR or second MOA product registered for this use as a tank mixture.
<b>Thrips:</b> Chilli thrips ( <i>Scirtothrips dorsalis</i> Hood) Western flower thrips ( <i>Frankliniella occidentalis</i> )	5.2 to 10	0.08 to 0.16	Use sufficient spray volume to ensure thorough and complete coverage of foliage.  Apply when thrips are immature and when populations are building, before crop damage occurs.  Western flower thrips are difficult to control because they may be concealed in blooms. Combinations with other effective insecticides will enhance overall control.  Alternation with other MOA products such as <b>Overture® 35 WP insecticide</b> or <b>Mesuro® 75-W</b> can help prevent resistance development. Incorporate an IGR such as <b>Pedestal® novaluron insecticide</b> in your spray program.



#### STORAGE AND DISPOSAL

**Do not** contaminate water, food or feed by storage or disposal.

##### **Pesticide Storage**

Keep A103.02 in its tightly closed original container, when not in use. **Do not** store below 32° F. **Do not** store in direct sunlight. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

##### **Pesticide Disposal**

Wastes resulting from the use of A103.02 may be disposed of on-site or at an approved waste disposal facility.

##### **Container Disposal**

**Nonrefillable Container:** **Do not reuse or refill this container.** Triple rinse or pressure rinse container (or equivalent) promptly after emptying (see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons) as follows:** Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Offer for recycling if available for reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and contain the spill with inert material (sand, earth, etc.) and transfer liquid and solid diking material to separate containers for disposal. Keep the spill out of all sewers and open bodies of water.

#### LIMITATION OF WARRANTY AND LIABILITY

**IMPORTANT: READ BEFORE USE.** Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of ATTICUS, LLC. All such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** To the extent consistent with applicable law, ATTICUS, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

**LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, neither ATTICUS, LLC the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent

with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

MesuroI is a registered trademark of Bayer AG, Germany

Overture is a registered trademark of Valent U.S.A. Corporation

Pedestal is a registered trademark of Makhteshim Agan of North America.

**{LANGUAGE ON LABEL AFFIXED TO  
CONTAINER}**

**A103.02**

**For Use Only On Fruiting Vegetables and Ornamental Crops Grown  
in Commercial Greenhouses**

**Active Ingredient:**

(% by weight)

Chlorfenapyr\* ..... 21.4%  
Other Ingredients ..... 78.6%  
Total ..... 100.0%

\* 4-bromo-2-(4-chlorophenyl)-1-(ethoxymethyl)-5-(trifluoromethyl)-1H-  
pyrrole-3-carbonitrile  
Contains 2.0 pounds of active ingredient per gallon.

See label booklet for First Aid, additional Precautionary Statements and  
Directions for Use.

**Manufactured For:**  
Atticus, LLC  
501 Cascade Pointe Lane, Suite 102  
Cary, NC 27513

**EPA Reg. No.: 91234-XX**  
**EPA Est. No.:**

**Net Contents:**

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

Si usted no entiende la etiqueta, busque a alguien para que se la  
explique a usted en detalle. (If you do not understand the label, find  
someone to explain it to you in detail.)

**Precautionary Statements**

**Hazards to Humans and Domestic Animals**

**CAUTION:** Harmful if swallowed, inhaled or absorbed through the skin.  
Causes moderate eye irritation. Avoid breathing vapors or spray mist.  
Avoid contact with skin, eyes or clothing. Wash hands thoroughly with  
soap and water after handling and before eating, drinking, chewing gum,  
using tobacco, or using the toilet. Remove and wash contaminated  
clothing before reuse.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage**

Keep A103.02 in its tightly closed original container, when not in use. Do  
not store below 32° F. Do not store in direct sunlight. Store in a cool, dry  
(preferably locked) area that is inaccessible to children and animals.

**Pesticide Disposal**

Wastes resulting from the use of A103.02 may be disposed of on-site or  
at an approved waste disposal facility.

**Container Disposal**

**Nonrefillable Container:** Do not reuse or refill this container. Triple  
rinse or pressure rinse container (or equivalent) promptly after emptying  
(see rinsing instructions below).

**Triple rinse containers small enough to shake (capacity ≤ 5 gallons)**  
**as follows:** Empty the remaining contents into application equipment or a  
mix tank and drain for 10 seconds after the flow begins to drip. Fill the  
container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate  
into application equipment or a mix tank, or store rinsate for later use or  
disposal. Drain for 10 seconds after the flow begins to drip. Repeat this  
procedure two more times. Offer for recycling if available for  
reconditioning if appropriate, or puncture and dispose of in a sanitary  
landfill, or by other procedures approved by state and local authorities.

**Pressure rinse as follows:** Empty the remaining contents into  
application equipment or mix tank and continue to drain for 10 seconds  
after the flow begins to drip. Hold container upside down over application  
equipment or mix tank, or collect rinsate for later use or disposal. Insert  
pressure rinsing nozzle in the side of the container and rinse at about 40  
PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to  
drip. Offer for recycling if available for reconditioning if appropriate, or  
puncture and dispose of in a sanitary landfill, or by other procedures  
approved by state and local authorities.

**Steps to be taken in case material is released or spilled:** Dike and  
contain the spill with inert material (sand, earth, etc.) and transfer liquid  
and solid diking material to separate containers for disposal. Keep the  
spill out of all sewers and open bodies of water.

